

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	Crim. No. 05-10003-NMG
v.	)	
	)	Violations:
ARTHUR GIANELLI,	)	18 USC 1962(c); 1962(d); 1963;
JOSEPH YERARDI, JR.,	)	371; 844(h)(1); 844(i); 892(a);
DENNIS ALBERTELLI A/K/A "FISH,"	)	894(a)(1); 981; 982; 1084;
PHILIP PUOPOLO,	)	1512(b)(1); 1951; 1952(a)(3); 1955;
SALVATORE RAMASCI A/K/A "LEFTY,"	)	1956(a)(1)(A)(i); 1956(a)(1)(B)(i);
FRANK IACABONI,	)	1956(h); and 2;
RANDY ALBERTELLI,	)	26 USC 7206(1); and
STEPHEN RUSSO A/K/A "MOON,"	)	31 USC 5324(a)
MICHAEL PINIALIS A/K/A "MAX,"	)	
ENEYDA GONZALEZ RODRIGUEZ,	)	
MARY ANN GIANELLI,	)	
GISELE ALBERTELLI, and	)	
RAFIA FEGHI A/K/A RAFIA YERARDI,	)	
	)	
Defendants.	)	

SECOND SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY in and for the District of Massachusetts charges  
that:

COUNT ONE  
(Racketeering Conspiracy)

THE ENTERPRISE

1. From in or before 1999 and continuing through the date of this indictment, within the District of Massachusetts and elsewhere, the defendants, **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A "FISH," PHILIP PUOPOLO, SALVATORE RAMASCI A/K/A "LEFTY," FRANK IACABONI, RANDY ALBERTELLI, STEPHEN RUSSO A/K/A "MOON," MICHAEL PINIALIS A/K/A "MAX," ENEYDA GONZALEZ**

**RODRIGUEZ, MARY ANN GIANELLI, GISELE ALBERTELLI, and RAFIA FEGHI A/K/A RAFIA YERARDI**, and others known and unknown to the grand jury, including, among others, co-racketeers Tony Daniels, Deeb Homs, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., were members and associates of a criminal organization (hereinafter the “Gianelli Group”) whose members and associates associated together and with others for the purpose of, among other things, earning money through illegal gambling activities, loansharking, extortion, money laundering, and committing crimes of violence including arson.

2. The Gianelli Group, including its leadership, membership, and associates, constituted an “enterprise” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce. The Gianelli Group affected interstate and foreign commerce by, among other things, the use of an offshore internet gambling site and a toll-free “800” number located in San Jose, Costa Rica, the extortion of individuals and entities whose activities affected interstate commerce, the control and operation of businesses affecting interstate commerce, the use of financial institutions affecting interstate commerce, and travel in interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At times material to the allegations contained in this indictment:

a. The defendant **ARTHUR GIANELLI** was the leader of the Gianelli Group. In that capacity, **ARTHUR GIANELLI** was responsible for the overall management of the group’s criminal activities including the operation of several illegal gambling businesses and the laundering of the proceeds of those illegal gambling businesses by investing the proceeds in otherwise

legitimate businesses and by engaging in loansharking. One of the illegal gambling businesses operated by the Gianelli Group was a sports betting business. A second gambling business operated by the Gianelli Group involved the illegal use of electronic gaming machines. A third illegal gambling business operated by members and associates of the enterprise involved the sale, distribution, and use of “football cards.” **ARTHUR GIANELLI** and other members of the Gianelli Group attempted to gain control of certain business through extortion.

b. The defendant **JOSEPH YERARDI, JR.** was convicted in 1995 of racketeering and related offenses including the operation of an illegal gambling business. As a result, **YERARDI** was incarcerated from approximately January 1995 through February 2005 except for a short period of time between approximately September 8, 2004 and approximately November 9, 2004. Despite his incarceration, **YERARDI** played a significant role in the management of the Gianelli Group’s affairs by maintaining frequent contacts with members and associates of the enterprise. While **YERARDI** was incarcerated, the defendant **GIANELLI** operated **YERARDI**’s gambling business and forwarded some of the proceeds of that illegal activity to **YERARDI** and **YERARDI**’s wife, the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI**.

c. The defendant **DENNIS ALBERTELLI A/K/A “FISH”** managed the sports betting business for **GIANELLI**. **ALBERTELLI** also acted as an agent for the sports betting business, *i.e.*, **ALBERTELLI** had his own customers and collected a commission from the business if his customers lost money. **ALBERTELLI** also assisted **GIANELLI** in the operation of an illegal electronic gaming machine business. **ALBERTELLI** also operated an illegal gambling business involving the use and distribution of football cards. **ALBERTELLI**’s son, the defendant **RANDY**

**ALBERTELLI**, and **ALBERTELLI**'s wife, the defendant **GISELE ALBERTELLI**, also participated in the operation of this illegal football card business.

d. The defendant **PHILIP PUOPOLO** engaged in illegal bookmaking and loansharking with other members of the Gianelli Group. **PUOPOLO** operated a sports betting office and acted as an agent for the defendant **ARTHUR GIANELLI** utilizing the offshore internet gambling site and the toll-free "800" number located in San Jose, Costa Rica. **PUOPOLO** also illegally operated electronic gaming machines at the Revere Businessmen's Association ("RBA"). He also attempted to persuade certain witnesses to provide false testimony.

e. The defendant **SALVATORE RAMASCI A/K/A "LEFTY"** acted as a bookkeeper for the Gianelli Group's illegal sports betting business. **RAMASCI** coordinated the collection of money due to the gambling business and the payout of money owed by the gambling business. **RAMASCI** also participated in the distribution of proceeds of this illegal gambling business to other members of the conspiracy including the defendants **JOSEPH YERARDI, JR.** and **RAFIA FEGHI**.

f. The defendant **FRANK IACABONI** was a close associate of the defendant **DENNIS ALBERTELLI**. **IACABONI** was a longtime bookmaker who participated in the Gianelli Group's sports betting business and the illegal football card business managed by **ALBERTELLI**. **IACABONI** also conspired with members of the Gianelli Group to damage a building by a fire or explosion when the owner of one of the businesses located in the building became involved in a dispute with members of the Gianelli Group.

g. The defendant **RANDY ALBERTELLI** participated in the Gianelli Group's illegal sports betting business. **RANDY ALBERTELLI** acted as an agent for the sports betting

business, *i.e.*, he had customers who placed bets with the business and he collected a commission on those bets. In that capacity, **RANDY ALBERTELLI** collected money owed by bettors to the Gianelli Group and paid money owed to bettors. **RANDY ALBERTELLI** also participated in an illegal football card business managed by his father, the defendant **DENNIS ALBERTELLI**.

h. The defendant **STEPHEN RUSSO A/K/A “MOON”** managed the sports betting office operated by the defendant **PHILIP PUOPOLO** and participated in illegal bookmaking with other members of the Gianelli Group.

i. The defendant **MICHAEL PINIALIS A/K/A “MAX,”** in conjunction with co-racketeer Todd Westerman and the defendant **ENEYDA GONZALEZ RODRIGUEZ**, operated co-racketeer Weshtod Consultants a/k/a Weshtod Consultores S.A., which ran an offshore gambling office in San Jose, Costa Rica. That office provided a toll-free “800” number for the Gianelli Group so that bettors inside the District of Massachusetts could place their bets over the telephone with the offshore office. The defendants **PINIALIS** and **GONZALEZ RODRIGUEZ**, and co-racketeers Westerman and Weshtod also provided an internet site for the Gianelli Group’s sports betting business so that bettors could place their bets over the internet. This internet site was accessed by bettors in the District of Massachusetts and elsewhere through the web address DukeSportsweb.com.

j. The defendant **ENEYDA GONZALEZ RODRIGUEZ** is the wife of the defendant **MICHAEL PINIALIS A/K/A “MAX”** and was the secretary of co-racketeer Weshtod Consultants a/k/a Weshtod Consultores S.A. She assisted the defendant **PINIALIS** and co-racketeer Westerman in the operation of co-racketeer Weshtod and its offshore gambling office in San Jose, Costa Rica.



k. The defendant **MARY ANN GIANELLI** is the wife of the defendant **ARTHUR GIANELLI**. She engaged in laundering proceeds of the Gianelli Group's illegal businesses, and knowingly filed materially false federal income tax returns that were intended to disguise the true nature of the reported income and create the incorrect impression that she had a lawful source of income during the tax years in question. She also engaged in illegally structured cash transactions in an attempt to avoid having reports of her cash transactions filed with the government.

l. The defendant **GISELE ALBERTELLI** is the wife of the defendant **DENNIS ALBERTELLI** and the mother of the defendant **RANDY ALBERTELLI**. **GISELE ALBERTELLI** participated in laundering proceeds of the Gianelli Group's sports betting business. **GISELE ALBERTELLI** also participated in the illegal football card business managed by the defendant **DENNIS ALBERTELLI**.

m. The defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** is the wife of the defendant **JOSEPH YERARDI, JR.** **FEGHI** was involved as a witness in litigation in federal court in matters surrounding the criminal activities of the defendant **JOSEPH YERARDI, JR.** including matters related to bail and forfeiture. **FEGHI** knowingly received proceeds generated from the criminal activities of the Gianelli Group which acted as a caretaker for the defendant **JOSEPH YERARDI, JR.**'s criminal affairs. **FEGHI** engaged in assorted schemes to conceal the true source of these proceeds including laundering some proceeds through the bank account of her first husband, Yousef Bina.

n. Co-racketeer Tony Daniels a/k/a "Sonny" participated in the operation of the Gianelli Group's sports betting business. Daniels acted as the liaison between the Gianelli Group

and the operators of an offshore gambling office in San Jose, Costa Rica utilized by the Gianelli Group. Daniels laundered proceeds of the Gianelli Group's sports betting business through several bank accounts including a bank account in the British West Indies in order to pay the operators of the offshore gambling office for services they provided to the Gianelli Group.

o. Co-racketeer Todd Westerman, president of co-racketeer Weshtod Consultants a/k/a Weshtod Consultores S.A., operated an offshore gambling office in San Jose, Costa Rica.

p. Co-racketeer Weshtod Consultants a/k/a Weshtod Consultores S.A., operated an offshore gambling office in San Jose, Costa Rica.

q. Co-racketeer Deeb Homsy was a close associate of the defendant **DENNIS ALBERTELLI**. **ALBERTELLI** used Homsy to provide "muscle" to assist **ALBERTELLI** in the collection of unlawful debts. Homsy also conspired with members of the Gianelli Group to damage a building by a fire or explosion when the owner of one of the businesses located in the building became involved in a dispute with members of the Gianelli Group.

#### GOALS AND PURPOSES OF THE ENTERPRISE

4. The primary goals and purposes of the Gianelli Group included the following:
  - a. Generating money for members and associates of the enterprise through illegal gambling activities, loansharking, the collection of unlawful debts, and extortion.
  - b. Laundering the proceeds of the aforementioned criminal activity for distribution to members and associates of the enterprise.
  - c. Engaging in the use of threats of violence and other methods of intimidation including arson to achieve the goals of the enterprise.

MEANS AND METHODS OF THE ENTERPRISE

5. To further their goal of generating money for the enterprise, members and associates of the Gianelli Group operated several illegal gambling businesses, loaned money at usurious rates, and invested the proceeds of their illegal activities in otherwise legitimate businesses.

6. The Gianelli Group associated itself with certain members of organized crime including members of the New England Family of La Cosa Nostra. This relationship enhanced the Gianelli Group's ability to operate the Group's criminal businesses. This relationship also protected the members and associates of the Gianelli Group from encroachment by other criminal competitors. The leaders of the Gianelli Group made payments to certain members of the New England Family of La Cosa Nostra for the "right" to operate their criminal businesses. These payments are colloquially known as "tribute" or "rent."

7. Members and associates of the Gianelli Group engaged in financial transactions with the proceeds of the Gianelli Group's criminal activities, many of which were designed, in whole or in part, to disguise the nature and sources of those proceeds and the relationships of members and associates of the Gianelli Group to those assets, and to shield those proceeds from seizure and forfeiture by law enforcement authorities. For example, members and associates of the Gianelli Group purchased postal money orders that were used in part to transfer proceeds of the Gianelli Group's illegal gambling activities to the defendant **JOSEPH YERARDI, JR.** and **YERARDI's** wife, the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** and to pay personal expenses of the defendants **ARTHUR GIANELLI** and **MARY ANN GIANELLI**.

8. Members and associates of the Gianelli Group infiltrated otherwise legitimate businesses and attempted to gain control of those businesses. They also used these businesses as



vehicles to engage in money laundering schemes. Further, members and associates of the Gianelli Group used threats of force and intimidation including arson to attempt to gain ownership and control of the aforementioned businesses. The businesses thus affected included the following:

a. Ben-Cor LLC d/b/a McCarthy's Bar and Grille, located at 903 Boylston Street in Boston, Massachusetts.

b. 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon, located at 21 Merchants Row in Boston, Massachusetts.

c. The Canine Entertainment Corp. d/b/a The Big Dog Sports Grille, located at 325 Broadway in Lynnfield, Massachusetts.

9. Similarly, members and associates of the Gianelli Group operated businesses engaged in legitimate business activities that were used to launder some of the proceeds of the Gianelli Group's illegal activities.

10. A part of the proceeds of the enterprise's illegal sports betting business was laundered to make it appear as though defendant **MARY ANN GIANELLI**, wife of the defendant **ARTHUR GIANELLI**, had a legitimate source of income. The defendants **ARTHUR GIANELLI**, **MARY ANN GIANELLI**, **DENNIS ALBERTELLI**, and **GISELE ALBERTELLI** engaged in an elaborate scheme to cause Dennele Transportation and Forge Village Transportation, two trucking companies with which the defendants **DENNIS ALBERTELLI** and **GISELE ALBERTELLI** were associated, to issue checks for services performed by **MARY ANN GIANELLI** when no such services were, in truth and fact, provided. The principals of Dennele Transportation and Forge Village Transportation were reimbursed with cash payments from the proceeds of the Gianelli Group's illegal sports betting business.

THE RACKETEERING CONSPIRACY

11. From in or before 1999 and continuing through the date of this indictment, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI A/K/A "LEFTY,"  
FRANK IACABONI,  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,  
MARY ANN GIANELLI,  
GISELE ALBERTELLI, and  
RAFIA FEGHI A/K/A RAFIA YERARDI,**

and others known and unknown to the grand jury, including, among others, co-racketeers Tony Daniels, Deeb Homs, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., being persons employed by and associated with the Gianelli Group, which enterprise engaged in, and whose activities affected, interstate and foreign commerce, did knowingly and intentionally conspire, confederate and agree to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5) as described in paragraphs 13 through 44 and through the collection of unlawful debt as set forth in paragraph 45.

12. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

**RACKETEERING ACT NUMBER ONE**  
(Illegal Gambling Business - Sports Betting)

13. From in or before 1999 and continuing at least until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A “FISH,” PHILIP PUOPOLO, SALVATORE RAMASCI A/K/A “LEFTY,” FRANK IACABONI, RANDY ALBERTELLI, STEPHEN RUSSO A/K/A “MOON,” MICHAEL PINIALIS A/K/A “MAX,” ENEYDA GONZALEZ RODRIGUEZ**, aided and abetted by others known and unknown to the grand jury, including co-racketeers Tony Daniels, Todd Westerman, and Weshtod Consultants, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a sports betting business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day in violation of Title 18, United States Code, Sections 1955 and 2.

**RACKETEERING ACT NUMBER TWO**  
(Illegal Gambling Business - Electronic Gaming Machines)

14. From in or before 1999 and continuing at least until in or about June 2006, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, MARY ANN GIANELLI, DENNIS ALBERTELLI A/K/A “FISH,” SALVATORE RAMASCI A/K/A “LEFTY,”** and **PHILIP PUOPOLO**, aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal

gambling business to wit: the illegal operation of electronic gaming machines which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day in violation of Title 18, United States Code, Sections 1955 and 2.

**RACKETEERING ACT NUMBER THREE**  
(Illegal Gambling Business - Football Cards)

15. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **DENNIS ALBERTELLI A/K/A "FISH," RANDY ALBERTELLI, GISELE ALBERTELLI, ARTHUR GIANELLI, and FRANK IACABONI**, aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a football card business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day in violation of Title 18, United States Code, Sections 1955 and 2.

RACKETEERING ACT NUMBER FOUR  
(Use of Wire Communication Facility - Telephone)

16. In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A "FISH," PHILIP PUOPOLO, SALVATORE RAMASCI A/K/A "LEFTY," RANDY ALBERTELLI, STEPHEN RUSSO A/K/A "MOON," MICHAEL PINIALIS A/K/A "MAX,"** and **ENEYDA GONZALEZ RODRIGUEZ**, aided and abetted by others known and unknown to the Grand Jury, including co-racketeers Tony Daniels, Todd Westerman, and Weshtod Consultants, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided the use of a toll-free telephone line to an offshore gaming office located in San Jose, Costa Rica for the purpose of placing wagers on sporting events in violation of Title 18, United States Code, Sections 1084 and 2.

RACKETEERING ACT NUMBER FIVE  
(Use of Wire Communication Facility - Internet)

17. In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A "FISH," PHILIP PUOPOLO, SALVATORE RAMASCI A/K/A "LEFTY," RANDY ALBERTELLI, STEPHEN RUSSO A/K/A "MOON," MICHAEL PINIALIS A/K/A "MAX,"** and **ENEYDA GONZALEZ RODRIGUEZ**, aided and abetted by



others known and unknown to the Grand Jury, including co-racketeers Tony Daniels, Todd Westerman, and Weshtod Consultants, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided an internet site located in San Jose, Costa Rica for the purpose of placing wagers on sporting events in violation of Title 18, United States Code, Sections 1084 and 2.

**RACKETEERING ACT NUMBER SIX**  
(Money Laundering Conspiracy)

18. From in or before 1999 and continuing at least until in or about June 2006, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity in violation of Section 1956(h) of Title 18 of the United States Code.

a. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** in the form of cash and postal money orders. These postal money orders aggregated approximately \$114,600.

b. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **JOSEPH YERARDI, JR.** in the form of postal money orders deposited into **YERARDI's** prison "canteen" account. Other postal money orders which represented proceeds of the illegal gambling business were sent to prison canteen accounts of other inmates designated by **YERARDI**. Further, postal money orders which represented proceeds of the illegal gambling business were forwarded at **YERARDI's** direction to other members of **YERARDI's** family. These postal money orders aggregated approximately \$74,300.

c. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, GISELE ALBERTELLI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **ARTHUR GIANELLI** by exchanging cash for checks payable to **ARTHUR GIANELLI's** wife, the defendant **MARY ANN GIANELLI**. The checks were drawn on the business accounts of two businesses with which the defendants **DENNIS ALBERTELLI** and **GISELE ALBERTELLI** were associated. The checks were drawn to make it appear as though **MARY ANN GIANELLI** had a legitimate source

of income and that the payments to **MARY ANN GIANELLI** were legitimate business expenses. These checks aggregated approximately \$238,335.

d. It was a part of the conspiracy that, at the direction of the defendant **ARTHUR GIANELLI**, co-racketeer Dennis Jenks a/k/a “Butch” distributed cash proceeds from the illegally operated electronic gaming machine business to the defendant **MARY ANN GIANELLI**, who converted such proceeds into postal money orders and Western Union money orders that were used for various purposes.

e. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI**, **DENNIS ALBERTELLI**, **SALVATORE RAMASCI**, co-racketeer Tony Daniels, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendants **MICHAEL PINIALIS** and **ENEYDA GONZALEZ RODRIGUEZ**, and to co-racketeers Todd Westerman and Weshtod Consultants. Co-racketeer Tony Daniels converted cash proceeds of the illegal gambling business to bank checks which he forwarded to Cypress Escrow located in Nevis, West Indies to pay the defendants **MICHAEL PINIALIS** and **ENEYDA GONZALEZ RODRIGUEZ**, and co-racketeers Todd Westerman and Weshtod Consultants for services provided to the Gianelli Group. These checks aggregated approximately \$37,419.

f. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI**, **DENNIS ALBERTELLI**, **SALVATORE RAMASCI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille and The Big Dog Realty Trust. This investment was made through payments in cash and checks used for multiple purposes related to the business of The Big Dog Sports Grille. The cash and checks aggregated approximately \$705,700.

g. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in Sports Zone, Inc. This investment was made through payments in cash and checks used for multiple purposes related to the business of Sports Zone, Inc. The cash and checks aggregated approximately \$200,000.

h. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI**, **DENNIS ALBERTELLI**, **SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to **ARTHUR GIANELLI**'s paramour Daniele Mazzei in the form of cash and postal money orders. The postal money orders aggregated approximately \$25,600.

i. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, deposited proceeds of the illegal gambling business into Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management. **GIANELLI** used this account to pay his personal expenses among other things. Cash deposited into this account aggregated approximately \$106,890.

**RACKETEERING ACT NUMBER SEVEN**  
(Money Laundering - Rafia Feghi)

19. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Seven.

a. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**JOSEPH YERARDI, JR.,** and **RAFIA FEGHI A/K/A RAFIA YERARDI** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and **RAFIA FEGHI A/K/A RAFIA YERARDI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$77,000 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.



	<b>Date</b>	<b>Amount</b>	<b>Serial Number</b>	<b>Payee</b>
(1)	8/31/2002	\$1,000.00	4906103477	Belmont Hill School
(2)	9/8/2002	\$1,000.00	5993558616	American Express
(3)	9/11/2002	\$1,000.00	5993562317	American Express
(4)	9/18/2002	\$1,000.00	4906105852	FCNB
(5)	9/27/2002	\$1,000.00	5017442365	Archstone Bearhill
(6)	9/28/2002	\$1,000.00	4906109520	Belmont Hill School
(7)	9/28/2002	\$1,000.00	4906109542	Belmont Hill School
(8)	10/10/2002	\$1,000.00	5017270713	MBNA America
(9)	10/25/2002	\$1,000.00	4906106662	American Express
(10)	10/31/2002	\$1,000.00	4906119341	American Express
(11)	11/8/2002	\$1,000.00	5019283203	Belmont Hill School
(12)	11/8/2002	\$1,000.00	5019283192	Belmont Hill School
(13)	11/16/2002	\$1,000.00	5017194900	FCNB
(14)	11/19/2002	\$1,000.00	4627804230	American Express
(15)	11/25/2002	\$1,000.00	5019319618	American Express
(16)	12/5/2002	\$1,000.00	5246731271	American Express
(17)	12/10/2002	\$1,000.00	5246731495	American Express
(18)	12/10/2002	\$1,000.00	5019295105	Belmont Hill School
(19)	12/10/2002	\$1,000.00	5019295116	Belmont Hill School
(20)	12/21/2002	\$1,000.00	4906124302	Rafia Feghi
(21)	12/24/2002	\$1,000.00	5254609151	American Express
(22)	12/30/2002	\$1,000.00	5254608745	American Express
(23)	1/9/2003	\$1,000.00	5017066762	American Express
(24)	1/16/2003	\$1,000.00	5254709692	Belmont Hill School
(25)	1/16/2003	\$1,000.00	5254709681	Belmont Hill School
(26)	1/27/2003	\$1,000.00	5013507003	American Express
(27)	2/6/2003	\$1,000.00	5013505473	American Express
(28)	2/11/2003	\$1,000.00	5254623246	Yossef Bina
(29)	2/19/2003	\$1,000.00	5254614551	Yossef Bina
(30)	2/25/2003	\$1,000.00	5246747482	American Express
(31)	2/25/2003	\$1,000.00	5013513540	Belmont Hill School
(32)	2/25/2003	\$1,000.00	5013513551	Belmont Hill School
(33)	3/12/2003	\$1,000.00	5013516205	American Express
(34)	3/18/2003	\$1,000.00	5255791481	Yossef Bina
(35)	3/27/2003	\$1,000.00	5254646411	Rafia Feghi
(36)	4/2/2003	\$1,000.00	5254626194	Belmont Hill School
(37)	4/2/2003	\$1,000.00	5254626205	Belmont Hill School
(38)	4/8/2003	\$1,000.00	5256529097	Rafia Feghi
(39)	4/14/2003	\$1,000.00	5013520233	Belmont Hill School
(40)	4/14/2003	\$1,000.00	5013520244	Green Point Mortgage
(41)	4/16/2003	\$1,000.00	5666179353	Belmont Hill School

(42)	4/22/2003	\$1,000.00	5666183638	Green Point Mortgage
(43)	4/30/2003	\$1,000.00	5666187150	Rafia Feghi
(44)	5/6/2003	\$1,000.00	5559229484	American Express
(45)	5/23/2003	\$1,000.00	5666940551	Green Point Mortgage
(46)	5/27/2003	\$1,000.00	5666515773	Rafia Feghi
(47)	6/7/2003	\$1,000.00	5667307110	American Express
(48)	6/12/2003	\$1,000.00	5666179948	American Express
(49)	6/20/2003	\$1,000.00	5666523884	Fidelity
(50)	6/26/2003	\$1,000.00	5666185563	Fidelity
(51)	7/3/2003	\$1,000.00	5666957414	American Express
(52)	7/12/2003	\$1,000.00	5246754952	American Express
(53)	7/21/2003	\$1,000.00	5559245853	Belmont Hill School
(54)	7/21/2003	\$1,000.00	5559245864	Belmont Hill School
(55)	7/26/2003	\$1,000.00	5992269197	American Express
(56)	8/8/2003	\$1,000.00	5993553780	American Express
(57)	8/14/2003	\$1,000.00	5667314073	Washington Mutual
(58)	8/22/2003	\$1,000.00	5994372262	Belmont Hill School
(59)	8/22/2003	\$1,000.00	5994372251	Belmont Hill School
(60)	8/22/2003	\$1,000.00	5666198883	Rafia Feghi
(61)	8/29/2003	\$1,000.00	5993558256	Rafia Feghi
(62)	9/15/2003	\$1,000.00	5993563498	Rafia Feghi
(63)	9/25/2003	\$1,000.00	5881185303	Belmont Hill School
(64)	9/25/2003	\$1,000.00	5881185314	Belmont Hill School
(65)	9/25/2003	\$1,000.00	5993561788	Washington Mutual
(66)	10/1/2003	\$1,000.00	5992622436	Rafia Feghi
(67)	10/11/2003	\$1,000.00	5881189601	American Express
(68)	10/16/2003	\$1,000.00	5992626183	Washington Mutual
(69)	10/22/2003	\$1,000.00	6244176846	Belmont Hill School
(70)	10/22/2003	\$1,000.00	6244176857	Belmont Hill School
(71)	10/22/2003	\$1,000.00	6245769363	Belmont Hill School
(72)	10/22/2003	\$1,000.00	6245769374	Washington Mutual
(73)	11/3/2003	\$1,000.00	6245773762	American Express
(74)	11/5/2003	\$1,000.00	6245854020	American Express
(75)	11/12/2003	\$1,000.00	5881194235	Rafia Feghi
(76)	11/21/2003	\$1,000.00	6245748393	Belmont Hill School
(77)	11/21/2003	\$1,000.00	6244191516	Belmont Hill School

RACKETEERING ACT NUMBER EIGHT  
(Money Laundering - Joseph Yerardi, Jr.)

20. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Eight.

a. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **JOSEPH YERARDI, JR.** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A "FISH,"** and **SALVATORE RAMASCI A/K/A "LEFTY,"** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of

illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$52,050 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>	<u>Payee</u>
(1)	8/31/2002	\$500.00	4412546853	Elizabeth Yerardi
(2)	8/31/2002	\$300.00	4906103455	FCI Raybrook
(3)	8/31/2002	\$500.00	4412546864	FCI Raybrook
(4)	9/8/2002	\$300.00	5993558638	FCI McKean
(5)	9/8/2002	\$500.00	5993558627	Linda Yerardi
(6)	9/11/2002	\$500.00	5993562328	Linda Yerardi
(7)	9/18/2002	\$600.00	5017441476	Elizabeth Yerardi
(8)	9/27/2002	\$600.00	5017442376	Elizabeth Yerardi
(9)	10/22/2002	\$300.00	5017453367	FCI McKean
(10)	11/5/2002	\$300.00	4630588470	Linda Yerardi
(11)	11/5/2002	\$700.00	4630588468	Linda Yerardi
(12)	11/16/2002	\$1,000.00	5017194911	Linda Yerardi
(13)	11/19/2002	\$500.00	4627804241	FCI Raybrook
(14)	11/19/2002	\$1,000.00	4627804228	Linda Yerardi
(15)	11/21/2002	\$300.00	5019285328	FCI Raybrook
(16)	11/23/2002	\$300.00	4630587772	FCI Raybrook
(17)	11/25/2002	\$300.00	5019319631	FCI Raybrook
(18)	11/25/2002	\$1,000.00	5019319620	Linda Yerardi
(19)	11/26/2002	\$400.00	4630579582	Alissa Yerardi
(20)	12/4/2002	\$1,000.00	5017459511	Linda Yerardi
(21)	12/10/2002	\$1,000.00	5017459803	Joseph & Elizabeth Yerardi
(22)	12/10/2002	\$500.00	5019295138	Joseph Yerardi Sr
(23)	12/10/2002	\$1,000.00	5246731506	Linda Yerardi
(24)	12/21/2002	\$300.00	4906124335	FCI Raybrook
(25)	12/21/2002	\$1,000.00	4906124313	Linda Yerardi
(26)	12/24/2002	\$300.00	5254609116	FCI Raybrook
(27)	12/30/2002	\$1,000.00	5254608734	Linda Yerardi



(28)	1/9/2003	\$500.00	5017066773	Alissa Yerardi
(29)	1/9/2003	\$1,000.00	5017066751	Linda Yerardi
(30)	1/21/2003	\$300.00	4630594961	Linda Yerardi
(31)	1/21/2003	\$700.00	4630594950	Linda Yerardi
(32)	1/27/2003	\$300.00	4630596963	FCI Raybrook
(33)	1/29/2003	\$300.00	5254616417	FCI Raybrook
(34)	1/29/2003	\$1,000.00	5254616406	Linda Yerardi
(35)	1/30/2003	\$300.00	5246743307	FCI Raybrook
(36)	2/6/2003	\$200.00	5246742690	Alissa Yerardi
(37)	2/6/2003	\$400.00	5246742677	Alissa Yerardi
(38)	2/6/2003	\$500.00	5013505506	Alissa Yerardi
(39)	2/6/2003	\$1,000.00	5013505484	Linda Yerardi
(40)	2/11/2003	\$1,000.00	5254623257	Linda Yerardi
(41)	2/19/2003	\$1,000.00	5254614540	Linda Yerardi
(42)	2/25/2003	\$1,000.00	5246747493	Linda Yerardi
(43)	3/4/2003	\$300.00	5246750564	FCI Raybrook
(44)	3/5/2003	\$1,000.00	5246747820	Joseph Yerardi
(45)	3/12/2003	\$500.00	5013516216	Alissa Yerardi
(46)	3/12/2003	\$300.00	5256522000	FCI Raybrook
(47)	3/12/2003	\$1,000.00	5254726994	Linda Yerardi
(48)	3/13/2003	\$300.00	5254628128	FCI Raybrook
(49)	3/18/2003	\$1,000.00	5255791492	Linda Yerardi
(50)	3/27/2003	\$1,000.00	5254646400	Linda Yerardi
(51)	3/31/2003	\$300.00	4630932022	Linda Yerardi
(52)	3/31/2003	\$700.00	4630932011	Linda Yerardi
(53)	4/8/2003	\$1,000.00	5256529108	Linda Yerardi
(54)	4/14/2003	\$200.00	5013520277	Alissa Yerardi
(55)	4/14/2003	\$200.00	5013520255	Elizabeth Yerardi
(56)	4/16/2003	\$500.00	5666179342	Alissa Yerardi
(57)	5/6/2003	\$200.00	5559229528	Elizabeth Yerardi
(58)	5/6/2003	\$200.00	5559229517	Elizabeth Yerardi
(59)	5/8/2003	\$500.00	5666515312	Alissa Yerardi
(60)	5/23/2003	\$500.00	5666940562	Linda Yerardi
(61)	5/27/2003	\$500.00	5666515784	Linda Yerardi
(62)	6/2/2003	\$500.00	5559236853	Alissa Yerardi
(63)	6/7/2003	\$500.00	5667307132	Linda Yerardi
(64)	6/12/2003	\$500.00	5666179961	Linda Yerardi
(65)	6/20/2003	\$500.00	5666523906	Linda Yerardi
(66)	6/26/2003	\$500.00	5666185585	Linda Yerardi
(67)	7/3/2003	\$500.00	5666957436	Linda Yerardi
(68)	7/12/2003	\$500.00	5246754974	Linda Yerardi
(69)	7/16/2003	\$500.00	5559245583	Linda Yerardi
(70)	7/26/2003	\$500.00	5992269210	Linda Yerardi



(71)	8/2/2003	\$500.00	4630940335	Alissa Yerardi
(72)	8/2/2003	\$500.00	4630940324	Linda Yerardi
(73)	8/8/2003	\$500.00	5993553936	Linda Yerardi
(74)	8/14/2003	\$500.00	5559248992	FCI McKean
(75)	8/14/2003	\$500.00	5667314084	Linda Yerardi
(76)	8/22/2003	\$500.00	5666198905	Linda Yerardi
(77)	8/29/2003	\$500.00	5993558280	Alissa Yerardi
(78)	8/29/2003	\$300.00	5992617262	FCI McKean
(79)	8/29/2003	\$500.00	5993558278	Linda Yerardi
(80)	8/30/2003	\$300.00	5881179374	FCI McKean
(81)	9/15/2003	\$500.00	5993563500	Linda Yerardi
(82)	9/25/2003	\$500.00	5993561801	Linda Yerardi
(83)	10/1/2003	\$500.00	5992622458	Alissa Yerardi
(84)	10/1/2003	\$300.00	5992622460	FCI McKean
(85)	10/9/2003	\$300.00	5993560528	FCI McKean
(86)	10/11/2003	\$300.00	5881189612	FCI McKean
(87)	10/22/2003	\$300.00	6245769385	FCI McKean
(88)	11/5/2003	\$500.00	6245854031	Alissa Yerardi
(89)	11/5/2003	\$300.00	6245854042	FCI McKean
(90)	11/6/2003	\$300.00	6244177320	FCI McKean
(91)	11/12/2003	\$300.00	5881194246	FCI McKean
(92)	12/3/2003	\$700.00	6245780332	Alissa Yerardi
(93)	12/3/2003	\$300.00	6245780343	FCI McKean
(94)	12/10/2003	\$500.00	6245783032	Alissa Yerardi
(95)	12/10/2003	\$550.00	6245783043	Alissa Yerardi
(96)	12/10/2003	\$300.00	6245783021	FCI McKean
(97)	12/17/2003	\$300.00	6245863694	FCI McKean
(98)	7/3/2003	\$500.00	5666957425	Alissa Yerardi

**RACKETEERING ACT NUMBER NINE**  
(Money Laundering - Forge Village Transportation)

21. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Nine.

a. From in or about July 1999 and continuing until in or about April 2000, both dates being approximate and inclusive, within the District of Massachusetts, the defendant **MARY ANN GIANELLI**, and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or about July 1999 and continuing until in or about April 2000, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH,"** and **MARY ANN GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code,

Section 1955, to wit, the exchange of cash for checks drawn on the account of Forge Village Transportation and made payable to the defendant **MARY ANN GIANELLI** in the approximate aggregate amount of \$19,895 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Nine, with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	7/15/1999	7526	\$758.03
(2)	7/22/1999	7530	\$628.15
(3)	7/29/1999	7534	\$809.57
(4)	8/5/1999	7358	\$660.51
(5)	8/19/1999	7548	\$639.81
(6)	9/2/1999	7556	\$517.51
(7)	9/9/1999	7560	\$712.14
(8)	10/7/1999	7577	\$578.85
(9)	10/14/1999	7581	\$539.18
(10)	10/21/1999	7585	\$679.94
(11)	10/28/1999	7589	\$514.43
(12)	11/10/1999	7598	\$540.60
(13)	11/18/1999	7603	\$554.56
(14)	11/24/1999	7611	\$496.03
(15)	12/8/1999	7617	\$490.18
(16)	12/9/1999	7622	\$533.04
(17)	12/16/1999	7627	\$504.79
(18)	12/23/1999	7632	\$544.50
(19)	12/30/1999	7636	\$541.18
(20)	1/6/2000	7641	\$424.56
(21)	1/13/2000	7645	\$573.53
(22)	1/20/2000	7649	\$550.54
(23)	1/27/2000	7653	\$545.67
(24)	2/3/2000	7658	\$541.93
(25)	2/10/2000	7664	\$495.23

(26)	2/17/2000	7670	\$578.88
(27)	2/24/2000	7675	\$497.20
(28)	3/2/2000	7680	\$504.11
(29)	3/9/2000	7686	\$489.46
(30)	3/16/2000	7691	\$474.22
(31)	3/23/2000	7696	\$517.78
(32)	3/30/2000	7701	\$563.74
(33)	4/6/2000	7707	\$420.89
(34)	4/13/2000	7713	\$511.33
(35)	4/20/2000	7720	\$441.75
(36)	4/27/2000	7727	\$522.04

**RACKETEERING ACT NUMBER TEN**  
(Money Laundering - Dennele Transportation)

22. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Ten.

a. From in or about May 2000 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **GISELE ALBERTELLI** and **MARY ANN GIANELLI**, and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or about May 2000 and continuing until in or about March 2004, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," GISELE ALBERTELLI, and MARY ANN GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks drawn on the account of Dennele Transportation and made payable to the defendant **MARY ANN GIANELLI** in the approximate aggregate amount of \$129,000 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and

2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	5/18/2000	1366	\$630.00
(2)	6/1/2000	1380	\$650.00
(3)	7/6/2000	1424	\$630.00
(4)	8/3/2000	1464	\$630.00
(5)	9/7/2000	1503	\$630.00
(6)	10/5/2000	1551	\$630.00
(7)	11/2/2000	1558	\$630.00
(8)	12/7/2000	1640	\$630.00
(9)	1/4/2001	1678	\$630.00
(10)	2/1/2001	1709	\$630.00
(11)	3/1/2001	1754	\$630.00
(12)	4/5/2001	1811	\$630.00
(13)	5/3/2001	1858	\$630.00



(14)	6/7/2001	1902	\$630.00
(15)	7/5/2001	1939	\$630.00
(16)	8/2/2001	1976	\$630.00
(17)	8/20/2001	2010	\$50,000.00
(18)	9/6/2001	2027	\$630.00
(19)	10/4/2001	2067	\$630.00
(20)	11/1/2001	2104	\$630.00
(21)	12/6/2001	2151	\$630.00
(22)	1/3/2002	2186	\$630.00
(23)	2/7/2002	2236	\$630.00
(24)	3/7/2002	2284	\$630.00
(25)	4/4/2002	2314	\$630.00
(26)	5/13/2002	2368	\$630.00
(27)	6/6/2002	2401	\$630.00
(28)	7/5/2002	2446	\$630.00
(29)	8/1/2002	2479	\$630.00
(30)	9/5/2002	2522	\$630.00
(31)	10/3/2002	2566	\$630.00
(32)	11/7/2002	2620	\$630.00
(33)	12/5/2002	2651	\$630.00
(34)	1/2/2003	2695	\$630.00
(35)	2/20/2003	2779	\$630.00
(36)	3/6/2003	2781	\$630.00
(37)	4/3/2003	2840	\$630.00
(38)	5/1/2003	2883	\$630.00
(39)	5/13/2003	2908	\$50,000.00
(40)	6/19/2003	2958	\$630.00
(41)	7/3/2003	2977	\$630.00
(42)	8/7/2003	3025	\$630.00
(43)	9/4/2003	3062	\$630.00
(44)	10/2/2003	3108	\$630.00
(45)	11/6/2003	3153	\$630.00
(46)	12/4/2003	3181	\$630.00
(47)	1/1/2004	3216	\$630.00
(48)	2/5/2004	3245	\$630.00

**RACKETEERING ACT NUMBER ELEVEN**  
(Money Laundering - Dennis Jenks a/k/a "Butch")

23. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Eleven.

a. From in or about September 2005 and continuing at least until in or about June 2006, both dates being approximate and inclusive, within the District of Massachusetts, the defendant **MARY ANN GIANELLI**, and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or about September 2005 and continuing at least until in or about June 2006, in the District of Massachusetts, the defendant **MARY ANN GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for

postal money orders and Western Union money orders in the approximate aggregate amount of \$84,343.00 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Eleven, with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Payee</u>	<u>Amount</u>	<u>Serial Number</u>
(1)	9/17/2005	Country Wide	\$1,000.00	8825665871
(2)	9/17/2005	Country Wide	\$1,000.00	8825665882
(3)	9/19/2005	Country Wide	\$1,000.00	8400432510
(4)	9/19/2005	Country Wide	\$1,000.00	8400432508
(5)	9/19/2005	Country Wide	\$1,000.00	8825669021
(6)	9/19/2005	Country Wide	\$1,000.00	8825046704
(7)	9/19/2005	Country Wide	\$1,000.00	8825669032
(8)	10/31/2005	Country Wide	\$1,000.00	8400440340
(9)	10/31/2005	Country Wide	\$1,000.00	6250596917
(10)	11/15/2005	Country Wide	\$953.88	8826874986
(11)	11/26/2005	Country Wide	\$1,000.00	7729984912
(12)	11/26/2005	Country Wide	\$1,000.00	7729984901
(13)	11/26/2005	Country Wide	\$1,000.00	8825695042
(14)	11/28/2005	Country Wide	\$1,000.00	9002521350
(15)	12/6/2005	Boston University	\$1,000.00	8824276304
(16)	12/6/2005	Boston University	\$1,000.00	8824276315
(17)	12/6/2005	Boston University	\$1,000.00	8824276326
(18)	12/6/2005	Boston University	\$1,000.00	8400488848
(19)	12/6/2005	Boston University	\$1,000.00	8400488850
(20)	12/6/2005	Boston University	\$1,000.00	7729985592
(21)	12/6/2005	Boston University	\$1,000.00	7729985603
(22)	12/6/2005	Boston University	\$500.00	7729985614
(23)	12/6/2005	Boston University	\$1,000.00	8825697843
(24)	12/6/2005	Boston University	\$1,000.00	8825697854
(25)	12/6/2005	Boston University	\$1,000.00	7729985597
(26)	12/6/2005	Boston University	\$1,000.00	8825847608
(27)	12/6/2005	Boston University	\$500.00	8825847610

(28)	12/6/2005	Boston University	\$1,000.00	9178522345
(29)	12/6/2005	Boston University	\$1,000.00	9178522356
(30)	12/6/2005	Boston University	\$500.00	9178522367
(31)	12/7/2005	Bentley College	\$1,000.00	8826018614
(32)	12/7/2005	Bentley College	\$1,000.00	8826018625
(33)	12/7/2005	Bentley College	\$500.00	8826018636
(34)	12/8/2005	Bentley College	\$500.00	9002524961
(35)	12/8/2005	Bentley College	\$1,000.00	9002524948
(36)	12/8/2005	Bentley College	\$1,000.00	9002524950
(37)	12/12/2005	Bentley College	\$1,000.00	8824278238
(38)	12/12/2005	Bentley College	\$1,000.00	8824278240
(39)	12/12/2005	Bentley College	\$1,000.00	8400494823
(40)	12/12/2005	Bentley College	\$1,000.00	8400494834
(41)	12/14/2005	Bentley College	\$1,000.00	8826018816
(42)	12/14/2005	Bentley College	\$1,000.00	8826018827
(43)	12/14/2005	Bentley College	\$1,000.00	8825847827
(44)	12/14/2005	Bentley College	\$1,000.00	8825847838
(45)	12/14/2005	Bentley College	\$500.00	8825847840
(46)	12/17/2005	Country Wide	\$923.11	08-169704876
(47)	12/19/2005	Bentley College	\$1,000.00	7729467546
(48)	12/19/2005	Mercedes Benz	\$500.00	7729467557
(49)	12/19/2005	Bentley College	\$1,000.00	7729467568
(50)	12/19/2005	Bentley College	\$1,000.00	9002525433
(51)	12/19/2005	Bentley College	\$1,000.00	9002525444
(52)	12/27/2005	Country Wide	\$500.00	08-376795968
(53)	12/27/2005	Country Wide	\$500.00	7729988668
(54)	12/28/2005	Country Wide	\$1,000.00	8400495532
(55)	12/28/2005	Country Wide	\$1,000.00	7728981366
(56)	12/28/2005	Country Wide	\$1,000.00	8400495543
(57)	1/5/2006	Mercedes Benz	\$1,000.00	8825844431
(58)	1/10/2006	Country Wide	\$1,000.00	8824277474
(59)	1/10/2006	Country Wide	\$1,000.00	8824277463
(60)	1/11/2006	Country Wide	\$500.00	08-376796156
(61)	1/13/2006	Safety Insurance Co.	\$1,000.00	9002528640
(62)	1/13/2006	Safety Insurance Co.	\$600.00	9002528651
(63)	1/17/2006	Country Wide	\$1,000.00	8818592231
(64)	1/17/2006	Country Wide	\$1,000.00	8818592220
(65)	1/22/2006	Country Wide	\$500.00	08-423961356
(66)	1/28/2006	Mercedes Benz	\$1,000.00	90002527020
(67)	2/10/2006	Country Wide	\$500.00	08-459563605
(68)	2/16/2006	Country Wide	\$1,000.00	8825864602
(69)	2/16/2006	Country Wide	\$1,000.00	8826030415
(70)	2/16/2006	Country Wide	\$1,000.00	7729996645



(71)	2/16/2006	Country Wide	\$1,000.00	8400498041
(72)	2/16/2006	Michael Marino	\$500.00	840049805
(73)	3/2/2006	Mercedes Benz	\$1,000.00	9237843002
(74)	3/20/2006	Country Wide	\$1,000.00	9514882978
(75)	3/24/2006	Country Wide	\$1,000.00	8826035016
(76)	3/24/2006	Country Wide	\$1,000.00	7728990423
(77)	3/25/2006	Country Wide	\$1,000.00	8825850360
(78)	4/20/2006	Safety Insurance Co.	\$866.00	9463968224
(79)	4/22/2006	Country Wide	\$1,000.00	8400436740
(80)	4/22/2006	Country Wide	\$1,000.00	7728989411
(81)	4/22/2006	Country Wide	\$1,000.00	9180886083
(82)	4/24/2006	Country Wide	\$1,000.00	9514888020
(83)	4/24/2006	Town of Lynnfield	\$1,000.00	951616789
(84)	4/24/2006	Town of Lynnfield	\$1,000.00	882603650
(85)	5/23/2006	Country Wide	\$500.00	08-474886215
(86)	5/23/2006	Country Wide	\$1,000.00	9179646827
(87)	5/23/2006	Country Wide	\$1,000.00	9514854630
(88)	5/23/2006	Country Wide	\$1,000.00	8825867144
(89)	5/23/2006	Country Wide	\$1,000.00	8400441982
(90)	6/21/2006	Country Wide	\$1,000.00	9823612825
(91)	6/21/2006	Country Wide	\$1,000.00	9463972915
(92)	6/23/2006	Country Wide	\$1,000.00	9514858386
(93)	6/24/2006	Country Wide	\$500.00	08-471108203

**RACKETEERING ACT NUMBER TWELVE**  
(Money Laundering - Tony Daniels)

24. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Twelve.

a. From in or about October 2003 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **MICHAEL PINIALIS A/K/A "MAX," ENEYDA GONZALEZ RODRIGUEZ**, and others known and unknown to the grand jury, including co-racketeers Tony Daniels, Todd Westerman, and Weshtod Consultants, knowing that the property involved in financial

transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or about October 2003 and continuing until in or about February 2004, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," MICHAEL PINIALIS A/K/A "MAX," and ENEYDA GONZALEZ RODRIGUEZ**, aided and abetted by others known and unknown to the Grand Jury, including co-racketeers Tony Daniels, Todd Westerman, and Weshtod Consultants, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the conversion of cash to bank checks made payable to Cypress Escrow and subsequent negotiation of said checks intended to pay for services provided to the Gianelli Group by the defendants **MICHAEL PINIALIS A/K/A "MAX," ENEYDA GONZALEZ RODRIGUEZ**, and co-racketeers Todd Westerman and Weshtod Consultants, in the approximate aggregate amount of \$37,419 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole

or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	10/14/2003	637628	\$6,200.00
(2)	10/15/2003	3859	\$12,400.00
(3)	2/19/2004	672480	\$18,819.00

**RACKETEERING ACT NUMBER THIRTEEN**  
(Money Laundering - The Big Dog)

25. From in or about June 1999 and continuing until in or about August 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A “FISH,”** and **SALVATORE RAMASCI A/K/A “LEFTY,”** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille and The Big Dog Realty Trust in the approximate aggregate amount of \$618,332 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Thirteen, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(1)	6/24/1999	Cash Deposit	\$25,000.00
(2)	8/7/2000	Cash Deposit	\$27,000.00
(3)	9/21/2000	Cash Deposit	\$30,000.00
(4)	11/5/2000	Cash Deposit	\$25,000.00
(5)	12/4/2000	Cash Deposit	\$25,000.00
(6)	12/18/2000	Cash Deposit	\$20,000.00
(7)	7/11/2001	Coach Lane Realty Trust	\$5,204.00
(8)	7/16/2001	Coach Lane Realty Trust	\$75,000.00
(9)	8/9/2001	Coach Lane Realty Trust	\$5,250.00
(10)	10/13/2001	Coach Lane Realty Trust	\$7,956.00
(11)	11/14/2001	Coach Lane Realty Trust	\$5,250.00
(12)	12/28/2001	Coach Lane Realty Trust	\$5,250.00
(13)	2/15/2002	Coach Lane Realty Trust	\$5,250.00
(14)	4/18/2002	Coach Lane Realty Trust	\$5,250.00
(15)	4/24/2002	Regnante Sterio & Osborne	\$2,925.00
(16)	5/15/2002	Coach Lane Realty Trust	\$5,250.00
(17)	5/27/2002	Regnante Sterio & Osborne	\$2,500.00
(18)	6/6/2002	Coach Lane Realty Trust	\$5,250.00
(19)	6/13/2002	Hayes Engineering	\$3,000.00
(20)	7/10/2002	Regnante Sterio & Osborne	\$6,500.00
(21)	7/11/2002	Coach Lane Realty Trust	\$5,250.00
(22)	8/15/2002	Coach Lane Realty Trust	\$5,250.00
(23)	9/13/2002	Coach Lane Realty Trust	\$5,250.00
(24)	10/17/2002	Coach Lane Realty Trust	\$5,250.00
(25)	4/18/2003	N.E Coin Op	\$100,000.00
(26)	5/2003	Cash Deposit	\$50,000.00
(27)	5/7/2003	Roger Williams Mint	\$3,600.00
(28)	5/16/2003	Regnante Sterio & Osborne	\$10,000.00
(29)	5/16/2003	N.E Coin Op	\$50,000.00
(30)	6/6/2003	Roger Williams Mint	\$3,625.00
(31)	6/24/2003	Hayes Engineering	\$5,000.00
(32)	6/30/2003	N.E Coin Op	\$25,000.00
(33)	7/3/2003	Cash Deposit	\$20,000.00
(34)	7/7/2003	Acme Sign Corp	\$8,272.00
(35)	8/2003	Cash Deposit	\$30,000.00



**RACKETEERING ACT NUMBER FOURTEEN**  
(Conspiracy And Attempt To Commit Extortion - The Big Dog)

26. The defendants named below committed the following acts involving extortion, the commission of any one of which constitutes the commission of Racketeering Act Number Fourteen.

a. From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH,"** and **FRANK IACABONI**, and others known and unknown to the grand jury, including co-racketeer Deeb Homs, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Sections 1951 and 2.

b. From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH,"** and **FRANK IACABONI**, and others known and unknown to the grand jury, including co-racketeer Deeb Homs, each aiding and abetting the other, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in that the defendants and their co-conspirators did attempt to damage and destroy a building located at 178 Main Street in North Reading, Massachusetts which housed a business establishment owned and operated by To The Dogs Restaurant Management, Corp. in violation of Title 18, United States Code, Sections 1951 and 2.

RACKETEERING ACT NUMBER FIFTEEN  
(Arson - The Big Dog)

27. On or about November 13, 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH,"** and **FRANK IACABONI**, and others known and unknown to the grand jury, including co-racketeer Deeb Homs, each aiding and abetting the other, did engage in acts and threats involving arson, which are chargeable under State law and punishable by imprisonment for more than one year, in that they did conspire and attempt to set fire to a shop and a building, to wit, the building located at 178 Main Street in North Reading, Massachusetts which housed two business establishments, by igniting a container of gasoline with a rag affixed, in violation of Massachusetts General Laws, Chapter 266, Sections 2 and 5A, and Chapter 274, Section 7.

RACKETEERING ACT NUMBER SIXTEEN  
(Interstate Travel In Aid Of Racketeering Enterprises - The Big Dog)

28. On or about and before November 13, 2003, in the District of Massachusetts and elsewhere, the defendants, **ARTHUR GIANELLI** and **DENNIS ALBERTELLI A/K/A "FISH,"** co-racketeer Deeb Homs, and others known and unknown to the grand jury, each aiding and abetting the other, did unlawfully and knowingly cause Sean Slater to travel in interstate commerce from New York to Massachusetts, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, arson in violation of Title 18, United States Code, Sections 844(i) and 844(h)(1), and did thereafter perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of said unlawful activity in that Sean Slater traveled from New York to Massachusetts to maliciously damage and destroy and attempt to damage and

destroy, by means of fire and an explosive, a building used in interstate commerce and engaged in an activity affecting interstate commerce located at 178 Main Street in North Reading, Massachusetts which housed two business establishments, and to use fire and an explosive to commit a felony which may be prosecuted in a court of the United States, namely, to commit the felony of conspiracy to affect, and the felony of attempt to affect, commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Sections 1951 and 2, all in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

RACKETEERING ACT NUMBER SEVENTEEN  
(Money Laundering - Slater Bail)

29. On or about November 22, 2003, in the District of Massachusetts, the defendant **DENNIS ALBERTELLI A/K/A "FISH,"** aided and abetted by others known and unknown to the Grand Jury, including co-racketeer Deeb Homs, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the posting of \$5,000 cash bail at the detention facility at Cambridge District Court for Sean Slater knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**RACKETEERING ACT NUMBER EIGHTEEN**  
(Conspiracy And Attempt To Commit Extortion - McCarthy's)

30. The defendant named below committed the following acts involving extortion, the commission of any one of which constitutes the commission of Racketeering Act Number Eighteen.

a. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

b. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

**RACKETEERING ACT NUMBER NINETEEN**  
(Conspiracy And Attempt To Commit Extortion - Clarke's)

31. The defendant named below committed the following acts involving extortion, the commission of any one of which constitutes the commission of Racketeering Act Number Nineteen.



a. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

b. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

**RACKETEERING ACT NUMBER TWENTY**  
(Money Laundering - Mazzei)

32. From in or before 1999 and continuing at least until in or about November 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of

illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders payable to Daniele Mazzei in the approximate aggregate amount of \$19,000 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Twenty, with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>
(1)	9/30/2002	\$600.00	4412670197
(2)	9/30/2002	\$700.00	4412670175
(3)	9/30/2002	\$700.00	4412670186
(4)	11/1/2002	\$600.00	4412674686
(5)	11/1/2002	\$700.00	4412674664
(6)	11/1/2002	\$700.00	4412674675
(7)	1/29/2003	\$700.00	4415762968
(8)	1/29/2003	\$700.00	4415762946
(9)	1/29/2003	\$1,000.00	5034010454
(10)	1/29/2003	\$1,000.00	5034010443
(11)	4/28/2003	\$1,000.00	5558954591
(12)	4/28/2003	\$1,000.00	5558954580
(13)	6/25/2003	\$1,000.00	5558965751
(14)	6/25/2003	\$1,000.00	5558965740
(15)	8/26/2003	\$800.00	5456564762
(16)	8/26/2003	\$800.00	5356564751
(17)	8/26/2003	\$800.00	5356564740
(18)	9/30/2003	\$600.00	5778038711
(19)	9/30/2003	\$1,000.00	5778038698
(20)	9/30/2003	\$1,000.00	5778038700
(21)	11/28/2003	\$600.00	6246618614
(22)	11/28/2003	\$1,000.00	6246618603
(23)	11/28/2003	\$1,000.00	6246618592

**RACKETEERING ACT NUMBER TWENTY-ONE**

(Money Laundering - Sports Zone, Inc.)

33. From in or about and between July and August 2002, in the District of Massachusetts, the defendant **ARTHUR GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in Sports Zone, Inc. in the approximate aggregate amount of \$200,000 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Twenty-One, with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<b><u>Date</u></b>	<b><u>Transaction</u></b>	<b><u>Amount</u></b>
(1)	7/7/2002	Cash	\$25,000.00
(2)	8/8/2002	Check	\$100,000.00
(3)	8/26/2002	Cash	\$75,000.00

**RACKETEERING ACT NUMBER TWENTY-TWO**

(Money Laundering - C&L Management)

34. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct

financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the deposit of said proceeds in Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management in the approximate aggregate amount of \$106,890 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Twenty-Two, with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(1)	6/23/2004	Cash	\$5,000.00
(2)	6/25/2004	Cash	\$5,000.00
(3)	6/29/2004	Cash	\$5,000.00
(4)	7/14/2004	Cash	\$1,000.00
(5)	7/20/2004	Cash	\$6,500.00
(6)	8/4/2004	Cash	\$5,000.00
(7)	8/9/2004	Cash	\$9,000.00
(8)	8/11/2004	Cash	\$8,950.00
(9)	8/12/2004	Cash	\$6,200.00
(10)	9/2/2004	Cash	\$9,000.00
(11)	9/14/2004	Cash	\$5,500.00
(12)	9/22/2004	Cash	\$5,400.00
(13)	9/29/2004	Cash	\$5,700.00
(14)	10/15/2004	Cash	\$5,000.00
(15)	10/25/2004	Cash	\$150.00
(16)	11/16/2004	Cash	\$2,940.00
(17)	11/18/2004	Cash	\$7,400.00
(18)	12/15/2004	Cash	\$7,500.00
(19)	12/17/2004	Cash	\$2,150.00
(20)	12/23/2004	Cash	\$4,500.00

**RACKETEERING ACT NUMBER TWENTY-THREE**  
**(Money Laundering - O'Connor)**

35. From in or about August 2001 and continuing until in or about September 2003, in the District of Massachusetts and elsewhere, the defendant **DENNIS ALBERTELLI A/K/A "FISH,"** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks made payable to Dennele Transportation in the approximate aggregate amount of \$97,049 as specifically set forth in the subpredicate racketeering acts below, the commission of any one of which constitutes the commission of Racketeering Act Number Twenty-Three, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

	<b><u>Date</u></b>	<b><u>Check No.</u></b>	<b><u>Amount</u></b>
(1)	8/22/2001	762	\$50,000.00
(2)	5/5/2003	1013	\$17,385.00
(3)	5/5/2003	1014	\$21,280.00
(4)	5/6/2003	1015	\$8,384.00

**RACKETEERING ACT NUMBER TWENTY-FOUR**  
**(Money Laundering - American Home Builders)**

36. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act Number Twenty-Four.



a. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR., RAFIA FEGHI A/K/A RAFIA YERARDI**, and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, *et seq.*, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal loansharking activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or before 1999 and continuing until in or about March 2004, in the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR., and RAFIA FEGHI A/K/A RAFIA YERARDI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, *et seq.*, to wit, the negotiation of checks drawn on the account of American Home Builders in the approximate aggregate amount of \$23,200 as specifically set forth in the subpredicate racketeering acts below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	3/16/1998	10510	\$200.00
(2)	4/2/1998	10556	\$300.00
(3)	4/10/1998	10584	\$200.00
(4)	4/16/1998	10615	\$300.00
(5)	5/28/1998	10772	\$300.00
(6)	6/1998	10792	\$200.00
(7)	6/18/1998	10836	\$200.00
(8)	6/26/1998	10876	\$200.00
(9)	7/20/1998	10972	\$200.00
(10)	8/20/1998	11083	\$200.00
(11)	9/2/1998	11147	\$300.00
(12)	9/16/1998	11187	\$200.00
(13)	9/23/1998	11217	\$200.00
(14)	10/22/1998	11293	\$200.00
(15)	11/19/1998	11386	\$100.00
(16)	11/24/1998	11407	\$200.00
(17)	12/17/1998	11484	\$200.00
(18)	1/21/1999	11569	\$200.00
(19)	2/4/1999	11615	\$200.00
(20)	3/2/1999	11688	\$200.00
(21)	4/7/1999	11792	\$200.00
(22)	4/21/1999	11863	\$300.00
(23)	5/5/1999	11935	\$200.00
(24)	5/20/1999	11994	\$200.00
(25)	6/3/1999	12061	\$200.00
(26)	6/15/1999	12120	\$200.00
(27)	6/25/1999	12171	\$200.00
(28)	7/14/1999	12265	\$200.00
(29)	7/27/1999	12358	\$200.00
(30)	8/4/1999	12336	\$200.00
(31)	8/6/1999	12422	\$200.00
(32)	9/9/1999	12557	\$200.00
(33)	9/16/1999	12586	\$200.00
(34)	9/29/1999	12635	\$200.00
(35)	10/13/1999	12685	\$200.00
(36)	10/27/1999	12741	\$200.00
(37)	11/10/1999	12783	\$200.00
(38)	11/23/1999	12847	\$200.00
(39)	12/1/1999	12871	\$200.00
(40)	12/8/1999	12899	\$200.00
(41)	1/19/2000	13059	\$200.00

(42)	2/2000	13090	\$200.00
(43)	3/3/2000	13251	\$200.00
(44)	3/15/2000	13317	\$300.00
(45)	3/22/2000	13361	\$200.00
(46)	4/5/2000	13427	\$200.00
(47)	4/19/2000	13492	\$200.00
(48)	5/10/2000	13688	\$200.00
(49)	5/17/2000	13725	\$200.00
(50)	6/7/2000	13795	\$200.00
(51)	6/14/2000	13822	\$200.00
(52)	6/21/2000	13839	\$200.00
(53)	7/12/2000	13943	\$200.00
(54)	8/2/2000	14005	\$200.00
(55)	8/16/2000	14080	\$200.00
(56)	8/22/2000	14233	\$400.00
(57)	9/27/2000	14244	\$200.00
(58)	10/4/2000	14270	\$200.00
(59)	11/30/2000	14445	\$200.00
(60)	1/10/2001	14573	\$200.00
(61)	1/25/2001	14609	\$200.00
(62)	1/31/2001	14636	\$200.00
(63)	2/11/2001	14674	\$200.00
(64)	4/4/2001	14816	\$200.00
(65)	4/12/2001	14853	\$200.00
(66)	5/2/2001	14932	\$200.00
(67)	6/14/2001	15064	\$200.00
(68)	6/20/2001	15084	\$200.00
(69)	6/23/2001	15005	\$200.00
(70)	7/3/2001	15117	\$200.00
(71)	7/25/2001	15186	\$200.00
(72)	8/29/2001	15291	\$200.00
(73)	9/6/2001	15319	\$200.00
(74)	10/24/2001	15478	\$200.00
(75)	1/23/2002	16345	\$200.00
(76)	2/20/2002	16438	\$200.00
(77)	2/27/2002	16455	\$200.00
(78)	4/2002	16653	\$200.00
(79)	4/17/2002	16614	\$200.00
(80)	5/8/2002	16663	\$200.00
(81)	5/15/2002	16692	\$200.00
(82)	5/23/2002	16726	\$200.00
(83)	5/29/2002	16742	\$200.00
(84)	6/19/2002	16796	\$200.00

(85)	7/3/2002	16850	\$200.00
(86)	7/31/2002	16916	\$200.00
(87)	9/6/2002	17016	\$200.00
(88)	9/21/2002	17081	\$200.00
(89)	10/11/2002	17135	\$200.00
(90)	10/18/2002	17150	\$200.00
(91)	10/28/2002	17170	\$200.00
(92)	11/8/2002	17243	\$200.00
(93)	3/21/2003	17581	\$200.00
(94)	3/28/2003	17602	\$200.00
(95)	4/18/2003	17662	\$200.00
(96)	4/25/2003	17684	\$200.00
(97)	5/23/2003	17792	\$300.00
(98)	6/6/2003	17848	\$200.00
(99)	6/13/2003	17868	\$200.00
(100)	6/28/2003	17915	\$200.00
(101)	8/8/2003	18072	\$200.00
(102)	8/14/2003	18099	\$200.00
(103)	9/19/2003	18205	\$200.00
(104)	10/10/2003	18287	\$400.00
(105)	10/24/2003	18333	\$200.00
(106)	11/7/2003	18380	\$200.00
(107)	12/19/2003	18491	\$200.00
(108)	1/9/2004	18565	\$200.00
(109)	1/23/2004	18604	\$200.00
(110)	3/5/2004	18740	\$200.00
(111)	3/12/2004	18788	\$200.00

**RACKETEERING ACT NUMBER TWENTY-FIVE**  
(Making Extortionate Extension Of Credit - Meehan)

37. In or before 2004 and continuing until in or about 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendant **PHILIP PUOPOLO** made extortionate extensions of credit to William Meehan in violation of Title 18, United States Code, Sections 892(a) and 2.



RACKETEERING ACT NUMBER TWENTY-SIX  
(Extortionate Collection Of Credit - Meehan)

38. In or about 2005, that date being approximate and inclusive, within the District of Massachusetts, the defendant **PHILIP PUOPOLO**, and others known and unknown to the grand jury, including co-racketeer Joseph Mercurio, knowingly conspired to and did participate in the use of extortionate means to collect and attempt to collect an extension of credit from William Meehan, in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

RACKETEERING ACT NUMBER TWENTY-SEVEN  
(Witness Tampering - Meehan)

39. In or about 2005, that date being approximate and inclusive, within the District of Massachusetts, the defendant **PHILIP PUOPOLO** knowingly attempted to corruptly persuade another person, to wit, William Meehan, and engaged in misleading conduct toward another person, to wit, William Meehan, with intent to influence the testimony of William Meehan in an official proceeding, in violation of Title 18, United States Code, Section 1512(b)(1).

RACKETEERING ACT NUMBER TWENTY-EIGHT  
(Extortionate Collection Of Credit - Barnes)

40. From in or before 2001 and continuing until in or about 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI** and **PHILIP PUOPOLO** and others known and unknown to the grand jury, knowingly conspired to and did participate in the use of extortionate means to collect and attempt to collect an extension of credit from Charles Christopher Barnes, in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

RACKETEERING ACT NUMBER TWENTY-NINE  
(Extortionate Collection Of Credit - Bakanosky)

41. From in or before 2003 and continuing until in or about 2004, both dates being approximate and inclusive, within the District of Massachusetts, the defendant **PHILIP PUOPOLO** and others known and unknown to the grand jury, knowingly conspired to and did participate in the use of extortionate means to collect and attempt to collect an extension of credit from Mike Bakanosky, in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

RACKETEERING ACT NUMBER THIRTY  
(Extortionate Collection Of Credit - Mousis)

42. From in or before August 2004 and continuing at least until in or about December 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., and PHILIP PUOPOLO**, and others known and unknown to the grand jury, including co-racketeer Joseph Mercurio, knowingly conspired to and did participate in the use of extortionate means to collect and attempt to collect an extension of credit from John Mousis, in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

RACKETEERING ACT NUMBER THIRTY-ONE  
(Extortionate Collection Of Credit - Castinetti)

43. From in or before 2000 and continuing until in or about 2004, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI, SALVATORE RAMASCI A/K/A "LEFTY," and PHILIP PUOPOLO**, and others known and unknown to the grand jury, knowingly conspired to and did participate in the use of

extortionate means to collect and attempt to collect an extension of credit from Philip Castinetti, in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

RACKETEERING ACT NUMBER THIRTY-TWO  
(Witness Tampering - James Puopolo)

44. In or about 2006, that date being approximate and inclusive, within the District of Massachusetts, the defendant **PHILIP PUPOLO** knowingly attempted to corruptly persuade another person, to wit, James Puopolo, and engaged in misleading conduct toward another person, to wit, James Puopolo, with intent to influence the testimony of James Puopolo in an official proceeding, in violation of Title 18, United States Code, Section 1512(b)(1).

COLLECTION OF UNLAWFUL DEBT

45. The collection of unlawful debt as defined by Title 18, United States Code, Section 1961(6), that is, a debt (A) incurred or contracted in gambling activity which was in violation of the law of the United States or the law of the Commonwealth of Massachusetts, or which was unenforceable in whole or in part as to principal or interest because of the laws relating to usury, and (B) which was incurred in connection with the business of gambling in violation of the law of the United States or the law of the Commonwealth of Massachusetts, or the business of lending money or a thing of value at a rate usurious under state or federal law, where the usurious rate was at least twice the enforceable rate, through which the defendants agreed to conduct and participate in the affairs of the enterprise, which was engaged in and the activities of which affect interstate commerce, consisted of multiple acts of collecting and attempting to collect and aiding and abetting in the collection and attempted collection of usurious loans and gambling debts as follows:

a. From in or before 1999 and continuing until in or about June 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Thomas Baker.

b. From in or before 1999 and continuing until in or about January 2005, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and **PHILIP PUOPOLO**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Paul Magliozzi.

c. From in or before 1999 and continuing until in or about June 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Michael Goudie.

d. From in or before 1999 and continuing until in or about September 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Dennis Willcox.

e. From in or before September 2000 and continuing until in or about January 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from John Mousis.



f. From in or before 1999 and continuing until in or about February 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from John Pappas.

g. From in or before 1999 and continuing until in or about June 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Ronald Ohanian.

h. From in or before 1999 and continuing until in or about April 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Francis Murray.

i. From in or before 1999 and continuing until in or about November 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Leonard Teperow.

j. From in or before 1999 and continuing until in or about April 2005, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY," PHILIP PUOPOLO, and STEPHEN RUSSO A/K/A "MOON,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from John Croshaw.

k. From in or before 2001 and continuing until in or about 2005, the defendants **ARTHUR GIANELLI** and **PHILIP PUOPOLO** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Charles Christopher Barnes.

l. From in or before 2003 and continuing until in or about 2004, the defendant **PHILIP PUOPOLO** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Scott Martinelli.

m. From in or before 2005 and continuing until in or about 2006, the defendants **PHILIP PUOPOLO** and **STEPHEN RUSSO A/K/A "MOON,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from James Puopolo.

n. From in or before 2003 and continuing until in or about 2005, the defendants **PHILIP PUOPOLO** and **STEPHEN RUSSO A/K/A "MOON"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Luigi Mirisola.

o. From in or before 2003 and continuing until in or about 2005, the defendants **PHILIP PUOPOLO** and **STEPHEN RUSSO A/K/A "MOON"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Robert Liberman.

p. From in or before 2003 and continuing until in or about 2004, the defendant **PHILIP PUOPOLO** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Mike Bakanosky.

q. From in or before 2004 and continuing until in or about 2005, the defendant **PHILIP PUOPOLO** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from George Paone.

r. From in or before 1999 and continuing until in or about August 2004, the defendants **JOSEPH YERARDI, JR., RAFIA FEGHI A/K/A RAFIA YERARDI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debt from Frank Murphy.

s. From in or before late 2003 and continuing until in or about early 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH,"** and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debts from Thomas Baker.

t. From in or before August 2002 and continuing at least until in or about December 2005, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY," JOSEPH YERARDI, JR.,** and **PHILIP PUOPOLO**, and others known and unknown to the grand jury, including co-racketeer Joseph Mercurio, participated in the collection and attempted collection of unlawful usurious debts from John Mousis.

u. From in or before 2000 and continuing until in or about 2004, the defendants **ARTHUR GIANELLI, SALVATORE RAMASCI A/K/A "LEFTY,"** and **PHILIP PUOPOLO**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debts from Philip Castinetti.

v. In or before 2004 and continuing until in or about 2005, the defendant **PHILIP PUOPOLO**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debts from David Trabucco.

w. From in or before 2004 and continuing until in or about 2005, the defendant **PHILIP PUOPOLO**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debts from Robert Liberman.

x. In or about 2005, the defendant **PHILIP PUOPOLO**, and others known and unknown to the grand jury, including co-racketeer Joseph Mercurio, participated in the collection and attempted collection of unlawful usurious debts from William Meehan.

All in violation of Title 18, United States Code, Section 1962(d).



COUNT TWO  
(Racketeering)

1. Paragraphs One through Ten of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From in or before 1999 and continuing through the date of this indictment, in the District of Massachusetts and elsewhere, the defendants herein,

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI A/K/A "LEFTY,"  
FRANK IACABONI,  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,  
MARY ANN GIANELLI,  
GISELE ALBERTELLI, and  
RAFIA FEGHI A/K/A RAFIA YERARDI,**

and others, known and unknown to the Grand Jury, including co-racketeers Tony Daniels, Deeb Homsy, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., being persons employed by and associated with the unlawful enterprise, did unlawfully and knowingly conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise, which was engaged in and the activities of which affected interstate and foreign commerce, through the pattern of racketeering activity particularly described in paragraphs 13 through 44 of Count One and collection of unlawful debt set forth in paragraph 45 of Count One, the contents of which are incorporated by reference as though fully set forth herein.

All in violation of Title 18, United States Code, Section 1962(c) and Section 2.

COUNT THREE  
(Illegal Gambling Business - Sports Betting)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI, A/K/A "LEFTY,"  
FRANK IACABONI,  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,**

aided and abetted by others known and unknown to the grand jury, including co-conspirators Tony Daniels, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a sports betting business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.

COUNT FOUR  
(Illegal Gambling Business - Electronic Gaming Machines)

From in or before 1999 and continuing at least until in or about June 2006, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH,"  
SALVATORE RAMASCI A/K/A "LEFTY,"  
MARY ANN GIANELLI, and  
PHILIP PUOPOLO,**

aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: the illegal operation of electronic gaming machines which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.

COUNT FIVE  
(Illegal Gambling Business - Football Cards)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

**DENNIS ALBERTELLI A/K/A “FISH,”  
RANDY ALBERTELLI,  
GISELE ALBERTELLI,  
ARTHUR GIANELLI, and  
FRANK IACABONI,**

aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a football card business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.

COUNT SIX

(Use Of Wire Communication Facility - Telephone)

In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI A/K/A "LEFTY,"  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,**

aided and abetted by others known and unknown to the Grand Jury, including co-conspirators Tony Daniels, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided the use of a toll-free telephone line to an offshore gaming office located in San Jose, Costa Rica for the purpose of placing wagers on sporting events.

In violation of Title 18, United States Code, Sections 1084 and 2.



COUNT SEVEN

(Use Of Wire Communication Facility - Internet)

In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI A/K/A "LEFTY,"  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,**

aided and abetted by others known and unknown to the Grand Jury, including co-conspirators Tony Daniels, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided an internet site located in San Jose, Costa Rica for the purpose of placing wagers on sporting events.

In violation of Title 18, United States Code, Sections 1084 and 2.

COUNT EIGHT  
(Money Laundering Conspiracy)

From in or before 1999 and continuing through the date of this indictment, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A “FISH,” and  
SALVATORE RAMASCI A/K/A “LEFTY,”**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

a. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** in the form of cash and postal money orders. The postal money orders aggregated approximately \$114,600.

b. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **JOSEPH**

**YERARDI, JR.** in the form of postal money orders deposited into **YERARDI's** prison "canteen" account. Other postal money orders which represented the proceeds of the illegal gambling business were sent to prison canteen accounts of other inmates designated by **YERARDI**. Further, postal money orders which represented the proceeds of the illegal gambling business were forwarded at **YERARDI's** direction to other members of **YERARDI's** family. These postal money orders aggregated approximately \$74,300.

c. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI, GISELE ALBERTELLI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **ARTHUR GIANELLI** by exchanging cash for checks payable to **ARTHUR GIANELLI's** wife, the defendant **MARY ANN GIANELLI**. The checks were drawn on the business accounts of two businesses with which the defendants **DENNIS ALBERTELLI** and **GISELE ALBERTELLI** were associated. The checks were drawn to make it appear as though **MARY ANN GIANELLI** had a legitimate source of income and that the payments to **MARY ANN GIANELLI** were legitimate business expenses. These checks aggregated approximately \$238,335.

d. It was a part of the conspiracy that, at the direction of the defendant **ARTHUR GIANELLI**, co-racketeer Dennis Jenks a/k/a "Butch" distributed cash proceeds from the illegally operated electronic gaming machine business to the defendant **MARY ANN GIANELLI**, who converted such proceeds into postal money orders and Western Union money orders that were used for various purposes.

e. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, co-conspirator Tony Daniels, and others

known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendants **MICHAEL PINIALIS A/K/A "MAX"** and **ENEYDA GONZALEZ RODRIGUEZ**, and co-conspirators Todd Westerman and Weshtod Consultants a/k/a Weshtod Consultores S.A. Co-conspirator Tony Daniels converted cash proceeds of the illegal gambling business to checks which he forwarded to Cypress Escrow located in Nevis, West Indies to pay the defendant **ENEYDA GONZALEZ RODRIGUEZ**, and co-conspirators Todd Westerman and Weshtod Consultants a/k/a Weshtod Consultores S.A. for services provided to the Gianelli Group. These checks aggregated approximately \$37,419.

f. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI**, **DENNIS ALBERTELLI**, **SALVATORE RAMASCI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille. This investment was made through payments in cash and checks used for multiple purposes related to the business of The Big Dog Sports Grille. The cash and checks aggregated approximately \$705,700.

g. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in Sports Zone, Inc. This investment was made through payments in cash and checks used for multiple purposes related to the business of Sports Zone, Inc. The cash and checks aggregated approximately \$200,000.

h. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI**, **DENNIS ALBERTELLI**, **SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to **ARTHUR GIANELLI's**

paramour Daniele Mazzei in the form of cash and postal money orders. The postal money orders aggregated approximately \$25,600.

i. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, deposited proceeds of the illegal gambling business into Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management. **GIANELLI** used this account to pay his personal expenses among other things. Cash deposits made to this account aggregated approximately \$106,890.

All in violation of Section 1956(h) of Title 18 of the United States Code.



COUNT NINE

(Money Laundering Conspiracy - Rafia Feghi)

From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**JOSEPH YERARDI, JR. and  
RAFIA FEGHI A/K/A RAFIA YERARDI,**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Ten through Eighty-Six which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

**COUNTS TEN THROUGH EIGHTY-SIX**  
**(Money Laundering - Rafia Feghi)**

From in or about August 2002 and continuing until in or about November 2003, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
SALVATORE RAMASCI A/K/A "LEFTY," and  
RAFIA FEGHI A/K/A RAFIA YERARDI,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$77,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Amount</u></b>	<b><u>Serial No.</u></b>	<b><u>Payee</u></b>
Count 10	8/31/2002	\$1,000.00	4906103477	Belmont Hill School
Count 11	9/8/2002	\$1,000.00	5993558616	American Express
Count 12	9/11/2002	\$1,000.00	5993562317	American Express
Count 13	9/18/2002	\$1,000.00	4906105852	FCNB
Count 14	9/27/2002	\$1,000.00	5017442365	Archstone Bearhill
Count 15	9/28/2002	\$1,000.00	4906109520	Belmont Hill School

Count 16	9/28/2002	\$1,000.00	4906109542	Belmont Hill School
Count 17	10/10/2002	\$1,000.00	5017270713	MBNA America
Count 18	10/25/2002	\$1,000.00	4906106662	American Express
Count 19	10/31/2002	\$1,000.00	4906119341	American Express
Count 20	11/8/2002	\$1,000.00	5019283203	Belmont Hill School
Count 21	11/8/2002	\$1,000.00	5019283192	Belmont Hill School
Count 22	11/16/2002	\$1,000.00	5017194900	FCNB
Count 23	11/19/2002	\$1,000.00	4627804230	American Express
Count 24	11/25/2002	\$1,000.00	5019319618	American Express
Count 25	12/5/2002	\$1,000.00	5246731271	American Express
Count 26	12/10/2002	\$1,000.00	5246731495	American Express
Count 27	12/10/2002	\$1,000.00	5019295105	Belmont Hill School
Count 28	12/10/2002	\$1,000.00	5019295116	Belmont Hill School
Count 29	12/21/2002	\$1,000.00	4906124302	Rafia Feghi
Count 30	12/24/2002	\$1,000.00	5254609151	American Express
Count 31	12/30/2002	\$1,000.00	5254608745	American Express
Count 32	1/9/2003	\$1,000.00	5017066762	American Express
Count 33	1/16/2003	\$1,000.00	5254709692	Belmont Hill School
Count 34	1/16/2003	\$1,000.00	5254709681	Belmont Hill School
Count 35	1/27/2003	\$1,000.00	5013507003	American Express
Count 36	2/6/2003	\$1,000.00	5013505473	American Express
Count 37	2/11/2003	\$1,000.00	5254623246	Yossef Bina

Count 38	2/19/2003	\$1,000.00	5254614551	Yossef Bina
Count 39	2/25/2003	\$1,000.00	5246747482	American Express
Count 40	2/25/2003	\$1,000.00	5013513540	Belmont Hill School
Count 41	2/25/2003	\$1,000.00	5013513551	Belmont Hill School
Count 42	3/12/2003	\$1,000.00	5013516205	American Express
Count 43	3/18/2003	\$1,000.00	5255791481	Yossef Bina
Count 44	3/27/2003	\$1,000.00	5254646411	Rafia Feghi
Count 45	4/2/2003	\$1,000.00	5254626194	Belmont Hill School
Count 46	4/2/2003	\$1,000.00	5254626205	Belmont Hill School
Count 47	4/8/2003	\$1,000.00	5256529097	Rafia Feghi
Count 48	4/14/2003	\$1,000.00	5013520233	Belmont Hill School
Count 49	4/14/2003	\$1,000.00	5013520244	Green Point Mortgage
Count 50	4/16/2003	\$1,000.00	5666179353	Belmont Hill School
Count 51	4/22/2003	\$1,000.00	5666183638	Green Point Mortgage
Count 52	4/30/2003	\$1,000.00	5666187150	Rafia Feghi
Count 53	5/6/2003	\$1,000.00	5559229484	American Express
Count 54	5/23/2003	\$1,000.00	5666940551	Green Point Mortgage
Count 55	5/27/2003	\$1,000.00	5666515773	Rafia Feghi
Count 56	6/7/2003	\$1,000.00	5667307110	American Express
Count 57	6/12/2003	\$1,000.00	5666179948	American Express
Count 58	6/20/2003	\$1,000.00	5666523884	Fidelity
Count 59	6/26/2003	\$1,000.00	5666185563	Fidelity

Count 60	7/3/2003	\$1,000.00	5666957414	American Express
Count 61	7/12/2003	\$1,000.00	5246754952	American Express
Count 62	7/21/2003	\$1,000.00	5559245853	Belmont Hill School
Count 63	7/21/2003	\$1,000.00	5559245864	Belmont Hill School
Count 64	7/26/2003	\$1,000.00	5992269197	American Express
Count 65	8/8/2003	\$1,000.00	5993553780	American Express
Count 66	8/14/2003	\$1,000.00	5667314073	Washington Mutual
Count 67	8/22/2003	\$1,000.00	5994372262	Belmont Hill School
Count 68	8/22/2003	\$1,000.00	5994372251	Belmont Hill School
Count 69	8/22/2003	\$1,000.00	5666198883	Rafia Feghi
Count 70	8/29/2003	\$1,000.00	5993558256	Rafia Feghi
Count 71	9/15/2003	\$1,000.00	5993563498	Rafia Feghi
Count 72	9/25/2003	\$1,000.00	5881185303	Belmont Hill School
Count 73	9/25/2003	\$1,000.00	5881185314	Belmont Hill School
Count 74	9/25/2003	\$1,000.00	5993561788	Washington Mutual
Count 75	10/1/2003	\$1,000.00	5992622436	Rafia Feghi
Count 76	10/11/2003	\$1,000.00	5881189601	American Express
Count 77	10/16/2003	\$1,000.00	5992626183	Washington Mutual
Count 78	10/22/2003	\$1,000.00	6244176846	Belmont Hill School
Count 79	10/22/2003	\$1,000.00	6244176857	Belmont Hill School
Count 80	10/22/2003	\$1,000.00	6245769363	Belmont Hill School
Count 81	10/22/2003	\$1,000.00	6245769374	Washington Mutual



Page 73

Count 82	11/3/2003	\$1,000.00	6245773762	American Express
Count 83	11/5/2003	\$1,000.00	6245854020	American Express
Count 84	11/12/2003	\$1,000.00	5881194235	Rafia Feghi
Count 85	11/21/2003	\$1,000.00	6245748393	Belmont Hill School
Count 86	11/21/2003	\$1,000.00	6244191516	Belmont Hill School

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNT EIGHTY-SEVEN**

(Money Laundering Conspiracy - Joseph Yerardi, Jr.)

From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**JOSEPH YERARDI, JR.**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Eighty-Eight through One Hundred Eighty-Five which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

**COUNTS EIGHTY-EIGHT THROUGH ONE HUNDRED EIGHTY-FIVE**  
**(Money Laundering - Joseph Yerardi, Jr.)**

From in or about August 2002 and continuing until in or about July 2003, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH," and  
SALVATORE RAMASCI A/K/A "LEFTY,"**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$52,050 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Amount</u></b>	<b><u>Serial No.</u></b>	<b><u>Payee</u></b>
Count 88	8/31/2002	\$500.00	4412546853	Elizabeth Yerardi
Count 89	8/31/2002	\$300.00	4906103455	FCI Raybrook
Count 90	8/31/2002	\$500.00	4412546864	FCI Raybrook
Count 91	9/8/2002	\$300.00	5993558638	FCI McKean
Count 92	9/8/2002	\$500.00	5993558627	Linda Yerardi
Count 93	9/11/2002	\$500.00	5993562328	Linda Yerardi
Count 94	9/18/2002	\$600.00	5017441476	Elizabeth Yerardi

Count 95	9/27/2002	\$600.00	5017442376	Elizabeth Yerardi
Count 96	10/22/2002	\$300.00	5017453367	FCI McKean
Count 97	11/5/2002	\$300.00	4630588470	Linda Yerardi
Count 98	11/5/2002	\$700.00	4630588468	Linda Yerardi
Count 99	11/16/2002	\$1,000.00	5017194911	Linda Yerardi
Count 100	11/19/2002	\$500.00	4627804241	FCI Raybrook
Count 101	11/19/2002	\$1,000.00	4627804228	Linda Yerardi
Count 102	11/21/2002	\$300.00	5019285328	FCI Raybrook
Count 103	11/23/2002	\$300.00	4630587772	FCI Raybrook
Count 104	11/25/2002	\$300.00	5019319631	FCI Raybrook
Count 105	11/25/2002	\$1,000.00	5019319620	Linda Yerardi
Count 106	11/26/2002	\$400.00	4630579582	Alissa Yerardi
Count 107	12/4/2002	\$1,000.00	5017459511	Linda Yerardi
Count 108	12/10/2002	\$1,000.00	5017459803	Jos. & Eliz. Yerardi
Count 109	12/10/2002	\$500.00	5019295138	Joseph Yerardi Sr.
Count 110	12/10/2002	\$1,000.00	5246731506	Linda Yerardi
Count 111	12/21/2002	\$300.00	4906124335	FCI Raybrook
Count 112	12/21/2002	\$1,000.00	4906124313	Linda Yerardi
Count 113	12/24/2002	\$300.00	5254609116	FCI Raybrook
Count 114	12/30/2002	\$1,000.00	5254608734	Linda Yerardi
Count 115	1/9/2003	\$500.00	5017066773	Alissa Yerardi
Count 116	1/9/2003	\$1,000.00	5017066751	Linda Yerardi

Count 117	1/21/2003	\$300.00	4630594961	Linda Yerardi
Count 118	1/21/2003	\$700.00	4630594950	Linda Yerardi
Count 119	1/27/2003	\$300.00	4630596963	FCI Raybrook
Count 120	1/29/2003	\$300.00	5254616417	FCI Raybrook
Count 121	1/29/2003	\$1,000.00	5254616406	Linda Yerardi
Count 122	1/30/2003	\$300.00	5246743307	FCI Raybrook
Count 123	2/6/2003	\$200.00	5246742690	Alissa Yerardi
Count 124	2/6/2003	\$400.00	5246742677	Alissa Yerardi
Count 125	2/6/2003	\$500.00	5013505506	Alissa Yerardi
Count 126	2/6/2003	\$1,000.00	5013505484	Linda Yerardi
Count 127	2/11/2003	\$1,000.00	5254623257	Linda Yerardi
Count 128	2/19/2003	\$1,000.00	5254614540	Linda Yerardi
Count 129	2/25/2003	\$1,000.00	5246747493	Linda Yerardi
Count 130	3/4/2003	\$300.00	5246750564	FCI Raybrook
Count 131	3/5/2003	\$1,000.00	5246747820	Joseph Yerardi
Count 132	3/12/2003	\$500.00	5013516216	Alissa Yerardi
Count 133	3/12/2003	\$300.00	5256522000	FCI Raybrook
Count 134	3/12/2003	\$1,000.00	5254726994	Linda Yerardi
Count 135	3/13/2003	\$300.00	5254628128	FCI Raybrook
Count 136	3/18/2003	\$1,000.00	5255791492	Linda Yerardi
Count 137	3/27/2003	\$1,000.00	5254646400	Linda Yerardi
Count 138	3/31/2003	\$300.00	4630932022	Linda Yerardi



Count 139	3/31/2003	\$700.00	4630932011	Linda Yerardi
Count 140	4/8/2003	\$1,000.00	5256529108	Linda Yerardi
Count 141	4/14/2003	\$200.00	5013520277	Alissa Yerardi
Count 142	4/14/2003	\$200.00	5013520255	Elizabeth Yerardi
Count 143	4/16/2003	\$500.00	5666179342	Alissa Yerardi
Count 144	5/6/2003	\$200.00	5559229528	Elizabeth Yerardi
Count 145	5/6/2003	\$200.00	5559229517	Elizabeth Yerardi
Count 146	5/8/2003	\$500.00	5666515312	Alissa Yerardi
Count 147	5/23/2003	\$500.00	5666940562	Linda Yerardi
Count 148	5/27/2003	\$500.00	5666515784	Linda Yerardi
Count 149	6/2/2003	\$500.00	5559236853	Alissa Yerardi
Count 150	6/7/2003	\$500.00	5667307132	Linda Yerardi
Count 151	6/12/2003	\$500.00	5666179961	Linda Yerardi
Count 152	6/20/2003	\$500.00	5666523906	Linda Yerardi
Count 153	6/26/2003	\$500.00	5666185585	Linda Yerardi
Count 154	7/3/2003	\$500.00	5666957436	Linda Yerardi
Count 155	7/12/2003	\$500.00	5246754974	Linda Yerardi
Count 156	7/16/2003	\$500.00	5559245583	Linda Yerardi
Count 157	7/26/2003	\$500.00	5992269210	Linda Yerardi
Count 158	8/2/2003	\$500.00	4630940335	Alissa Yerardi
Count 159	8/2/2003	\$500.00	4630940324	Linda Yerardi
Count 160	8/8/2003	\$500.00	5993553936	Linda Yerardi

Count 161	8/14/2003	\$500.00	5559248992	FCI McKean
Count 162	8/14/2003	\$500.00	5667314084	Linda Yerardi
Count 163	8/22/2003	\$500.00	5666198905	Linda Yerardi
Count 164	8/29/2003	\$500.00	5993558280	Alissa Yerardi
Count 165	8/29/2003	\$300.00	5992617262	FCI McKean
Count 166	8/29/2003	\$500.00	5993558278	Linda Yerardi
Count 167	8/30/2003	\$300.00	5881179374	FCI McKean
Count 168	9/15/2003	\$500.00	5993563500	Linda Yerardi
Count 169	9/25/2003	\$500.00	5993561801	Linda Yerardi
Count 170	10/1/2003	\$500.00	5992622458	Alissa Yerardi
Count 171	10/1/2003	\$300.00	5992622460	FCI McKean
Count 172	10/9/2003	\$300.00	5993560528	FCI McKean
Count 173	10/11/2003	\$300.00	5881189612	FCI McKean
Count 174	10/22/2003	\$300.00	6245769385	FCI McKean
Count 175	11/5/2003	\$500.00	6245854031	Alissa Yerardi
Count 176	11/5/2003	\$300.00	6245854042	FCI McKean
Count 177	11/6/2003	\$300.00	6244177320	FCI McKean
Count 178	11/12/2003	\$300.00	5881194246	FCI McKean
Count 179	12/3/2003	\$700.00	6245780332	Alissa Yerardi
Count 180	12/3/2003	\$300.00	6245780343	FCI McKean
Count 181	12/10/2003	\$500.00	6245783032	Alissa Yerardi
Count 182	12/10/2003	\$550.00	6245783043	Alissa Yerardi

Page 80

Count 183	12/10/2003	\$300.00	6245783021	FCI McKean
Count 184	12/17/2003	\$300.00	6245863694	FCI McKean
Count 185	7/03/2003	\$500.00	5666957425	Alissa Yerardi

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNT ONE HUNDRED EIGHTY-SIX**  
**(Money Laundering Conspiracy - Dennele Transportation)**

From in or about May 2000 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**MARY ANN GIANELLI and**  
**GISELE ALBERTELLI,**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts One Hundred Eighty-Seven through Two Hundred Thirty-Four which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS ONE HUNDRED EIGHTY-SEVEN THROUGH TWO HUNDRED THIRTY-FOUR  
(Money Laundering - Dennele Transportation)

From in or about May 2000 and continuing until in or about February 2004, in the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH,"  
MARY ANN GIANELLI, and  
GISELE ALBERTELLI,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks drawn on the account of Dennele Transportation and made payable to **MARY ANN GIANELLI** in the approximate aggregate amount of \$129,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count No.</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
Count 187	5/18/2000	1366	\$630.00
Count 188	6/1/2000	1380	\$650.00
Count 189	7/6/2000	1424	\$630.00
Count 190	8/3/2000	1464	\$630.00
Count 191	9/7/2000	1503	\$630.00
Count 192	10/5/2000	1551	\$630.00



Count 193	11/2/2000	1558	\$630.00
Count 194	12/7/2000	1640	\$630.00
Count 195	1/4/2001	1678	\$630.00
Count 196	2/1/2001	1709	\$630.00
Count 197	3/1/2001	1754	\$630.00
Count 198	4/5/2001	1811	\$630.00
Count 199	5/3/2001	1858	\$630.00
Count 200	6/7/2001	1902	\$630.00
Count 201	7/5/2001	1939	\$630.00
Count 202	8/2/2001	1976	\$630.00
Count 203	8/20/2001	2010	\$50,000.00
Count 204	9/6/2001	2027	\$630.00
Count 205	10/4/2001	2067	\$630.00
Count 206	11/1/2001	2104	\$630.00
Count 207	12/6/2001	2151	\$630.00
Count 208	1/3/2002	2186	\$630.00
Count 209	2/7/2002	2236	\$630.00
Count 210	3/7/2002	2284	\$630.00
Count 211	4/4/2002	2314	\$630.00
Count 212	5/13/2002	2368	\$630.00
Count 213	6/6/2002	2401	\$630.00
Count 214	7/5/2002	2446	\$630.00

Count 215	8/1/2002	2479	\$630.00
Count 216	9/5/2002	2522	\$630.00
Count 217	10/3/2002	2566	\$630.00
Count 218	11/7/2002	2620	\$630.00
Count 219	12/5/2002	2651	\$630.00
Count 220	1/2/2003	2695	\$630.00
Count 221	2/20/2003	2779	\$630.00
Count 222	3/6/2003	2781	\$630.00
Count 223	4/3/2003	2840	\$630.00
Count 224	5/1/2003	2883	\$630.00
Count 225	5/13/2003	2908	\$50,000.00
Count 226	6/19/2003	2958	\$630.00
Count 227	7/3/2003	2977	\$630.00
Count 228	8/7/2003	3025	\$630.00
Count 229	9/4/2003	3062	\$630.00
Count 230	10/2/2003	3108	\$630.00
Count 231	11/6/2003	3153	\$630.00
Count 232	12/4/2003	3181	\$630.00
Count 233	1/1/2004	3216	\$630.00
Count 234	2/5/2004	3245	\$630.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNT TWO HUNDRED THIRTY-FIVE**  
**(Money Laundering Conspiracy - Tony Daniels)**

From in or about October 2003 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**MICHAEL PINIALIS A/K/A “MAX” and  
ENEYDA GONZALEZ RODRIGUEZ,**

co-conspirators Tony Daniels, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Two Hundred Thirty-Six through Two Hundred Thirty-Eight which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS TWO HUNDRED THIRTY-SIX THROUGH TWO HUNDRED THIRTY-EIGHT  
(Money Laundering - Tony Daniels)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH,"  
MICHAEL PINIALIS A/K/A "MAX," and  
ENEYDA GONZALEZ RODRIGUEZ,**

aided and abetted by others known and unknown to the Grand Jury, including co-conspirators Tony Daniels, Todd Westerman, and Weshtod Consultants a/k/a Weshtod Consultores S.A., knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the conversion of cash to bank checks made payable to Cypress Escrow and subsequent negotiation of said checks intended to pay for services provided to the Gianelli Group by the defendants **MICHAEL PINIALIS A/K/A "MAX"** and **ENEYDA GONZALEZ RODRIGUEZ**, and co-conspirators Todd Westerman and Weshtod Consultants a/k/a Weshtod Consultores S.A. in the approximate aggregate amount of \$37,419 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count No.</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
Count 236	10/14/2003	637628	\$6,200.00
Count 237	10/15/2003	3859	\$12,400.00

Page 87

Count 238 2/19/2004 672480 \$18,819.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.



**COUNTS TWO HUNDRED THIRTY-NINE THROUGH TWO HUNDRED SEVENTY-TWO**  
**(Money Laundering - The Big Dog)**

From in or before June 1999 and continuing until in or about April 2003, in the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH," and  
SALVATORE RAMASCI A/K/A "LEFTY,"**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille and The Big Dog Realty Trust in the approximate aggregate amount of \$593,332 as specifically set forth below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Transaction</u></b>	<b><u>Amount</u></b>
Count 239	8/7/2000	Cash Deposit	\$27,000.00
Count 240	9/21/2000	Cash Deposit	\$30,000.00
Count 241	11/5/2000	Cash Deposit	\$25,000.00
Count 242	12/4/2000	Cash Deposit	\$25,000.00
Count 243	12/18/2000	Cash Deposit	\$20,000.00
Count 244	7/11/2001	Coach Lane Realty Trust	\$5,204.00

Count 245	7/16/2001	Coach Lane Realty Trust	\$75,000.00
Count 246	8/9/2001	Coach Lane Realty Trust	\$5,250.00
Count 247	10/13/2001	Coach Lane Realty Trust	\$7,956.00
Count 248	11/14/2001	Coach Lane Realty Trust	\$5,250.00
Count 249	12/28/2001	Coach Lane Realty Trust	\$5,250.00
Count 250	2/15/2002	Coach Lane Realty Trust	\$5,250.00
Count 251	4/18/2002	Coach Lane Realty Trust	\$5,250.00
Count 252	4/24/2002	Regnante Sterio & Osborne	\$2,925.00
Count 253	5/15/2002	Coach Lane Realty Trust	\$5,250.00
Count 254	5/27/2002	Regnante Sterio & Osborne	\$2,500.00
Count 255	6/6/2002	Coach Lane Realty Trust	\$5,250.00
Count 256	6/13/2002	Hayes Engineering	\$3,000.00
Count 257	7/10/2002	Regnante Sterio & Osborne	\$6,500.00
Count 258	7/11/2002	Coach Lane Realty Trust	\$5,250.00
Count 259	8/15/2002	Coach Lane Realty Trust	\$5,250.00
Count 260	9/13/2002	Coach Lane Realty Trust	\$5,250.00
Count 261	10/17/2002	Coach Lane Realty Trust	\$5,250.00
Count 262	4/18/2003	N.E Coin Op	\$100,000.00
Count 263	5/2003	Cash Deposit	\$50,000.00
Count 264	5/7/2003	Roger Williams Mint	\$3,600.00
Count 265	5/16/2003	Regnante Sterio & Osborne	\$10,000.00
Count 266	5/16/2003	N.E Coin Op	\$50,000.00

Page 90

Count 267	6/6/2003	Roger Williams Mint	\$3,625.00
Count 268	6/24/2003	Hayes Engineering	\$5,000.00
Count 269	6/30/2003	N.E Coin Op	\$25,000.00
Count 270	7/3/2003	Cash Deposit	\$20,000.00
Count 271	7/7/2003	Acme Sign Corp	\$8,272.00
Count 272	8/2003	Cash Deposit	\$30,000.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT TWO HUNDRED SEVENTY-THREE

(Conspiracy To Commit Arson, To Use Fire And An Explosive To Commit A Felony Which May Be Prosecuted In A Court Of The United States, And To Travel In Interstate Commerce To Promote, Manage, Establish, Carry On, And Facilitate The Promotion, Management, Establishment, And Carrying On Of Unlawful Activity.)

1. On or about and before November 13, 2003, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH," and  
FRANK IACABONI,**

and others known and unknown to the grand jury including Deeb Homsy, Michael McCormack, and Sean Slater, did conspire, confederate, and agree to: (1) maliciously damage and destroy and attempt to damage and destroy by means of fire and an explosive a building used in interstate commerce and engaged in an activity affecting interstate commerce in violation of Title 18, United States Code, Section 844(i); (2) use fire and an explosive to commit a felony which may be prosecuted in a court of the United States in violation of Title 18, United States Code, Section 844(h)(1); and (3) travel in interstate commerce to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity in violation of Title 18, United States Code, Section 1952(a)(3); in that the defendants agreed to: damage and attempt to damage the building located at 178 Main Street in North Reading, Massachusetts which housed two business establishments by igniting a container of gasoline with a rag affixed; use that fire and that explosive to commit the felony of affecting, attempting to affect, and conspiring to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss, which felony may

be prosecuted in a court of the United States pursuant to Title 18, United States Code, Section 1951; and cause Sean Slater to travel from New York to Massachusetts to accomplish the goals of the conspiracy.

#### MANNER AND MEANS

2. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI** operated an illegal gambling business. The defendant **ARTHUR GIANELLI** invested a substantial amount of money which included proceeds of this illegal gambling business in the development of a sports bar called the “The Big Dog Sports Grille” located on Route 1 in Lynnfield, Massachusetts. The defendant **ARTHUR GIANELLI** held his ownership interest in the Big Dog Sports Grille through third party nominees in order to conceal said ownership interest.

3. It was further part of the conspiracy that the defendant **ARTHUR GIANELLI** sought to gain a controlling interest in The Canine Entertainment Corporation, the corporation that owned and operated The Big Dog Sports Grille, through threats and intimidation. In furtherance of this objective, the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI** caused a fire to be set at a building which housed a second The Big Dog Sports Grille location in North Reading, Massachusetts in an effort to intimidate certain recalcitrant shareholders of The Canine Entertainment Corporation and to injure those shareholders financially.

4. It was also part of the conspiracy that the defendant **FRANK IACABONI** and the co-conspirator Deeb Homsı attempted to locate and hire individuals to set the fire. Eventually, the co-conspirator Deeb Homsı hired Slater and McCormack to set the fire to the building located at 178



Main Street in North Reading, Massachusetts which housed The Big Dog Sports Grille and another business establishment.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH," and  
FRANK IACABONI,**

and their co-conspirators, including Deeb Homs, committed and caused to be committed, in the District of Massachusetts and elsewhere, the following overt acts, among others:

a. On November 2, 2003, the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI** engaged in a conversation related to the arson; particularly, **GIANELLI** told **DENNIS ALBERTELLI**, "Gotta make sure nobody is in there, you know."

b. On November 10, 2003, the defendants **DENNIS ALBERTELLI** and **IACABONI** engaged in a conversation related to the arson; particularly they discussed the appearance of the building located at 178 Main Street in North Reading, Massachusetts.

c. On November 11, 2003, the defendants **GIANELLI** and **DENNIS ALBERTELLI** engaged in a conversation related to the arson; particularly they discussed the timing of the arson.

d. On November 11, 2003, the defendants **DENNIS ALBERTELLI** and **IACABONI** engaged in a conversation related to the arson; particularly they discussed the timing of the arson.

e. On November 11, 2003, the defendant **DENNIS ALBERTELLI** and co-conspirator Deeb Homsy engaged in a conversation related to the arson; particularly they discussed the timing of the arson.

f. On November 11, 2003, the defendant **IACABONI** attended a meeting related to the arson.

g. On or before November 13, 2003, Sean Slater traveled from New York to Massachusetts.

h. On or about November 13, 2003, Sean Slater and Michael McCormack traveled to the vicinity of 178 Main Street in North Reading, Massachusetts.

i. On or about November 13, 2003, Sean Slater ignited a container of gasoline at the entry to Romeo's Pizza located at 178 Main Street in North Reading, Massachusetts.

j. On or about November 22, 2003, Michael McCormack met with the defendant **DENNIS ALBERTELLI** and co-conspirator Deeb Homsy at 75 Green Street in Clinton, Massachusetts.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO HUNDRED SEVENTY-FOUR**  
**(Arson - The Big Dog)**

On or about November 13, 2003, in the District of Massachusetts, the defendants,

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH, and  
FRANK IACABONI,**

aided and abetted by others known and unknown to the grand jury, including co-conspirator Deeb Homs, and being vicariously liable for the acts of each other and their co-conspirators, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, a building used in interstate commerce and engaged in an activity affecting interstate commerce in that the defendants and their co-conspirators did damage and attempt to damage the building located at 178 Main Street in North Reading, Massachusetts which housed two business establishments by igniting a container of gasoline with a rag affixed.

In violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT TWO HUNDRED SEVENTY-FIVE

(Using Fire And An Explosive To Commit A Felony Which May Be Prosecuted In A Court Of The United States)

On or about November 13, 2003, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A “FISH,” and  
FRANK IACABONI,**

aided and abetted by others known and unknown to the grand jury, including co-conspirator Deeb Homs, and being vicariously liable for the acts of each other and their co-conspirators, did use fire and an explosive to commit a felony which may be prosecuted in a court of the United States, to wit, they used fire and an explosive to damage and attempt to damage the building located at 178 Main Street in North Reading, Massachusetts which housed two business establishments by igniting a container of gasoline with a rag affixed, and they used that fire and that explosive to commit the felony of affecting, attempting to affect, and conspiring to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss, which felony may be prosecuted in a court of the United States pursuant to Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Section 844(h)(1) and 2.

COUNT TWO HUNDRED SEVENTY-SIX  
(Conspiracy To Commit Extortion - The Big Dog)

From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH," and  
FRANK IACABONI,**

and others known and unknown to the grand jury, including co-conspirator Deeb Homs, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951.



**COUNT TWO HUNDRED SEVENTY-SEVEN**  
**(Attempted Extortion - The Big Dog)**

From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A “FISH,” and  
FRANK IACABONI,**

aided and abetted by others known and unknown to the grand jury, including co-conspirator Deeb Homs, and being vicariously liable for the acts of each other and their co-conspirators, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in that the defendants and their co-conspirators did attempt to damage and destroy a building located at 178 Main Street in North Reading, Massachusetts which housed a business establishment which was owned and operated by To The Dogs Restaurant Management, Corp.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT TWO HUNDRED SEVENTY-EIGHT**  
(Interstate Travel In Aid Of Racketeering Enterprises.)

On or about and before November 13, 2003, in the District of Massachusetts and elsewhere,  
the defendants,

**ARTHUR GIANELLI and  
DENNIS ALBERTELLI A/K/A “FISH,”**

aided and abetted by others known and unknown to the grand jury, including co-conspirator Deeb Homs, and being vicariously liable for the acts of each other and their co-conspirators, did unlawfully and knowingly cause Sean Slater to travel in interstate commerce from New York to Massachusetts, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, arson in violation of Title 18, United States Code, Section 844(i), and use of fire and an explosive to commit a felony which may be prosecuted in a court of the United States in violation of Title 18, United States Code, Section 844(h)(1), and did thereafter perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of said unlawful activity in that Sean Slater traveled from New York to Massachusetts to maliciously damage and destroy and attempt to damage and destroy, by means of fire and an explosive, a building used in interstate commerce and engaged in an activity affecting interstate commerce located at 178 Main Street in North Reading, Massachusetts which housed two business establishments, and to use that fire and that explosive to commit the felony of affecting, attempting to affect, and conspiring to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence,

Page 100

and fear of economic loss, which felony may be prosecuted in a court of the United States pursuant to Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Section 1952(a)(3) and 2.

COUNT TWO HUNDRED SEVENTY-NINE  
(Money Laundering - Slater Bail)

On or about and between November 22 and November 23, 2003, in the District of Massachusetts, the defendant

**DENNIS ALBERTELLI A/K/A “FISH,”**

aided and abetted by others known and unknown to the Grand Jury, including co-conspirator Deeb Homs, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the posting of \$5,000 cash bail at the detention facility at Cambridge District Court for Sean Slater knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNT TWO HUNDRED EIGHTY**  
**(Conspiracy To Commit Extortion - McCarthy's)**

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**ARTHUR GIANELLI**

and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti, with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951.



COUNT TWO HUNDRED EIGHTY-ONE  
(Attempt To Commit Extortion - McCarthy's)

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**ARTHUR GIANELLI,**

aided and abetted by others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti, with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951 and 2.

**COUNT TWO HUNDRED EIGHTY-TWO**  
**(Conspiracy To Commit Extortion - Clarke's)**

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**ARTHUR GIANELLI**

and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951.

**COUNT TWO HUNDRED EIGHTY-THREE**  
**(Attempt To Commit Extortion - Clarke's)**

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**ARTHUR GIANELLI,**

aided and abetted by others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNTS TWO HUNDRED EIGHTY-FOUR THROUGH THREE HUNDRED SIX**  
**(Money Laundering - Mazzei)**

From in or about September 2002 and continuing at least until in or about November 2003,  
in the District of Massachusetts, the defendants

**ARTHUR GIANELLI and**  
**DENNIS ALBERTELLI A/K/A "FISH,"**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders made payable to Daniele Mazzei in the approximate aggregate amount of \$19,000 as specifically set forth below, with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Amount</u></b>	<b><u>Serial No.</u></b>
Count 284	9/30/2002	\$600.00	4412670197
Count 285	9/30/2002	\$700.00	4412670175
Count 286	9/30/2002	\$700.00	4412670186
Count 287	11/1/2002	\$600.00	4412674686
Count 288	11/1/2002	\$700.00	4412674664
Count 289	11/1/2002	\$700.00	4412674675
Count 290	1/29/2003	\$700.00	4415762968

Count 291	1/29/2003	\$700.00	4415762946
Count 292	1/29/2003	\$1,000.00	5034010454
Count 293	1/29/2003	\$1,000.00	5034010443
Count 294	4/28/2003	\$1,000.00	5558954591
Count 295	4/28/2003	\$1,000.00	5558954580
Count 296	6/25/2003	\$1,000.00	5558965751
Count 297	6/25/2003	\$1,000.00	5558965740
Count 298	8/26/2003	\$800.00	5456564762
Count 299	8/26/2003	\$800.00	5356564751
Count 300	8/26/2003	\$800.00	5356564740
Count 301	9/30/2003	\$600.00	5778038711
Count 302	9/30/2003	\$1,000.00	5778038698
Count 303	9/30/2003	\$1,000.00	5778038700
Count 304	11/28/2003	\$600.00	6246618614
Count 305	11/28/2003	\$1,000.00	6246618603
Count 306	11/28/2003	\$1,000.00	6246618592

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.



**COUNTS THREE HUNDRED SEVEN THROUGH THREE HUNDRED NINE**  
**(Money Laundering - Sports Zone, Inc.)**

From in or about and between July and August 2002, in the District of Massachusetts, the defendant

**ARTHUR GIANELLI,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in Sports Zone, Inc. in the approximate aggregate amount of \$200,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count No.</u>	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
Count 307	7/7/02	Cash	\$25,000.00
Count 308	8/8/02	Check	\$100,000.00
Count 309	8/26/02	Cash	\$75,000.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNTS THREE HUNDRED TEN THROUGH THREE HUNDRED TWENTY-NINE**  
**(Money Laundering - C&L Management)**

From in or about June 2004 and continuing until in or about December 2004, in the District of Massachusetts and elsewhere, the defendant

**ARTHUR GIANELLI,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the deposit of said proceeds in Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management in the approximate aggregate amount of \$106,890 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Transaction</u></b>	<b><u>Amount</u></b>
Count 310	6/23/2004	Cash	\$5,000.00
Count 311	6/25/2004	Cash	\$5,000.00
Count 312	6/29/2004	Cash	\$5,000.00
Count 313	7/14/2004	Cash	\$1,000.00
Count 314	7/20/2004	Cash	\$6,500.00
Count 315	8/4/2004	Cash	\$5,000.00
Count 316	8/9/2004	Cash	\$9,000.00

Count 317	8/11/2004	Cash	\$8,950.00
Count 318	8/12/2004	Cash	\$6,200.00
Count 319	9/2/2004	Cash	\$9,000.00
Count 320	9/14/2004	Cash	\$5,500.00
Count 321	9/22/2004	Cash	\$5,400.00
Count 322	9/29/2004	Cash	\$5,700.00
Count 323	10/15/2004	Cash	\$5,000.00
Count 324	10/25/2004	Cash	\$150.00
Count 325	11/16/2004	Cash	\$2,940.00
Count 326	11/18/2004	Cash	\$7,400.00
Count 327	12/15/2004	Cash	\$7,500.00
Count 328	12/17/2004	Cash	\$2,150.00
Count 329	12/23/2004	Cash	\$4,500.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNTS THREE HUNDRED THIRTY THROUGH FOUR HUNDRED TWENTY-TWO**  
**(Money Laundering - Dennis Jenks a/k/a "Butch")**

From in or about September 2005 and continuing at least until in or about June 2006, in the District of Massachusetts, the defendant **MARY ANN GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for postal money orders and Western Union money orders in the approximate aggregate amount of \$84,343.00 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Payee</u></b>	<b><u>Amount</u></b>	<b><u>Serial Number</u></b>
Count 330	9/17/2005	Country Wide	\$1,000.00	8825665871
Count 331	9/17/2005	Country Wide	\$1,000.00	8825665882
Count 332	9/19/2005	Country Wide	\$1,000.00	8400432510
Count 333	9/19/2005	Country Wide	\$1,000.00	8400432508
Count 334	9/19/2005	Country Wide	\$1,000.00	8825669021
Count 335	9/19/2005	Country Wide	\$1,000.00	8825046704
Count 336	9/19/2005	Country Wide	\$1,000.00	8825669032
Count 337	10/31/2005	Country Wide	\$1,000.00	8400440340
Count 338	10/31/2005	Country Wide	\$1,000.00	6250596917

Count 339	11/15/2005	Country Wide	\$953.88	8826874986
Count 340	11/26/2005	Country Wide	\$1,000.00	7729984912
Count 341	11/26/2005	Country Wide	\$1,000.00	7729984901
Count 342	11/26/2005	Country Wide	\$1,000.00	8825695042
Count 343	11/28/2005	Country Wide	\$1,000.00	9002521350
Count 344	12/6/2005	Boston University	\$1,000.00	8824276304
Count 345	12/6/2005	Boston University	\$1,000.00	8824276315
Count 346	12/6/2005	Boston University	\$500.00	8824276326
Count 347	12/6/2005	Boston University	\$1,000.00	8400488848
Count 348	12/6/2005	Boston University	\$1,000.00	8400488850
Count 349	12/6/2005	Boston University	\$1,000.00	7729985592
Count 350	12/6/2005	Boston University	\$1,000.00	7729985603
Count 351	12/6/2005	Boston University	\$500.00	7729985614
Count 352	12/6/2005	Boston University	\$1,000.00	8825697843
Count 353	12/6/2005	Boston University	\$1,000.00	8825697854
Count 354	12/6/2005	Boston University	\$1,000.00	7729985597
Count 355	12/6/2005	Boston University	\$1,000.00	8825847608
Count 356	12/6/2005	Boston University	\$500.00	8825847610
Count 357	12/6/2005	Boston University	\$1,000.00	9178522345
Count 358	12/6/2005	Boston University	\$1,000.00	9178522356
Count 359	12/6/2005	Boston University	\$500.00	9178522367
Count 360	12/7/2005	Bentley College	\$1,000.00	8826018614

Count 361	12/7/2005	Bentley College	\$1,000.00	8826018625
Count 362	12/7/2005	Bentley College	\$500.00	8826018636
Count 363	12/8/2005	Bentley College	\$500.00	9002524961
Count 364	12/8/2005	Bentley College	\$1,000.00	9002524948
Count 365	12/8/2005	Bentley College	\$1,000.00	9002524950
Count 366	12/12/2005	Bentley College	\$1,000.00	8824278238
Count 367	12/12/2005	Bentley College	\$1,000.00	8824278240
Count 368	12/12/2005	Bentley College	\$1,000.00	8400494823
Count 369	12/12/2005	Bentley College	\$1,000.00	8400494834
Count 370	12/14/2005	Bentley College	\$1,000.00	8826018816
Count 371	12/14/2005	Bentley College	\$1,000.00	8826018827
Count 372	12/14/2005	Bentley College	\$1,000.00	8825847827
Count 373	12/14/2005	Bentley College	\$1,000.00	8825847838
Count 374	12/14/2005	Bentley College	\$500.00	8825847840
Count 375	12/17/2005	Country Wide	\$923.11	08-169704876
Count 376	12/19/2005	Bentley College	\$1,000.00	7729467546
Count 377	12/19/2005	Mercedes Benz	\$500.00	7729467557
Count 378	12/19/2005	Bentley College	\$1,000.00	7729467568
Count 379	12/19/2005	Bentley College	\$1,000.00	9002525433
Count 380	12/19/2005	Bentley College	\$1,000.00	9002525444
Count 381	12/27/2005	Country Wide	\$500.00	08-376795968
Count 382	12/27/2005	Country Wide	\$500.00	7729988668



Count 383	12/28/2005	Country Wide	\$1,000.00	8400495532
Count 384	12/28/2005	Country Wide	\$1,000.00	7728981366
Count 385	12/28/2005	Country Wide	\$1,000.00	8400495543
Count 386	1/5/2006	Mercedes Benz	\$1,000.00	8825844431
Count 387	1/10/2006	Country Wide	\$1,000.00	8824277474
Count 388	1/10/2006	Country Wide	\$1,000.00	8824277463
Count 389	1/11/2006	Country Wide	\$500.00	08-376796156
Count 390	1/13/2006	Safety Insurance Co.	\$1,000.00	9002528640
Count 391	1/13/2006	Safety Insurance Co.	\$600.00	9002528651
Count 392	1/17/2006	Country Wide	\$1,000.00	8818592231
Count 393	1/17/2006	Country Wide	\$1,000.00	8818592220
Count 394	1/22/2006	Country Wide	\$500.00	08-423961356
Count 395	1/28/2006	Mercedes Benz	\$1,000.00	90002527020
Count 396	2/10/2006	Country Wide	\$500.00	08-459563605
Count 397	2/16/2006	Country Wide	\$1,000.00	8825864602
Count 398	2/16/2006	Country Wide	\$1,000.00	8826030415
Count 399	2/16/2006	Country Wide	\$1,000.00	7729996645
Count 400	2/16/2006	Country Wide	\$1,000.00	8400498041
Count 401	2/16/2006	Michael Marino	\$500.00	840049805
Count 402	3/2/2006	Mercedes Benz	\$1,000.00	9237843002
Count 403	3/20/2006	Country Wide	\$1,000.00	9514882978
Count 404	3/24/2006	Country Wide	\$1,000.00	8826035016

Count 405	3/24/2006	Country Wide	\$1,000.00	7728990423
Count 406	3/25/2006	Country Wide	\$1,000.00	8825850360
Count 407	4/20/2006	Safety Insurance Co.	\$866.00	9463968224
Count 408	4/22/2006	Country Wide	\$1,000.00	8400436740
Count 409	4/22/2006	Country Wide	\$1,000.00	7728989411
Count 410	4/22/2006	Country Wide	\$1,000.00	9180886083
Count 411	4/24/2006	Country Wide	\$1,000.00	9514888020
Count 412	4/24/2006	Town of Lynnfield	\$1,000.00	951616789
Count 413	4/24/2006	Town of Lynnfield	\$1,000.00	882603650
Count 414	5/23/2006	Country Wide	\$500.00	08-474886215
Count 415	5/23/2006	Country Wide	\$1,000.00	9179646827
Count 416	5/23/2006	Country Wide	\$1,000.00	9514854630
Count 417	5/23/2006	Country Wide	\$1,000.00	8825867144
Count 418	5/23/2006	Country Wide	\$1,000.00	8400441982
Count 419	6/21/2006	Country Wide	\$1,000.00	9823612825
Count 420	6/21/2006	Country Wide	\$1,000.00	9463972915
Count 421	6/23/2006	Country Wide	\$1,000.00	9514858386
Count 422	6/24/2006	Country Wide	\$500.00	08-471108203

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

**COUNTS FOUR HUNDRED TWENTY-THREE THROUGH FOUR HUNDRED TWENTY-SIX**  
**(Money Laundering - Mark O'Connor)**

From in or about August 2001 and continuing until in or about September 2003, in the District of Massachusetts and elsewhere, the defendant

**DENNIS ALBERTELLI A/K/A "FISH,"**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks made payable to Dennele Transportation in the approximate aggregate amount of \$97,049 as specifically set forth below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count No.</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
Count 423	8/22/2001	762	\$50,000.00
Count 424	5/5/2003	1013	\$17,385.00
Count 425	5/5/2003	1014	\$21,280.00
Count 426	5/6/2003	1015	\$8,384.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNT FOUR HUNDRED TWENTY-SEVEN**  
**(Money Laundering Conspiracy - American Home Builders)**

From in or before 1999 and continuing until in or about March 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**JOSEPH YERARDI, JR. and**  
**RAFIA FEGHI A/K/A RAFIA YERARDI**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Four Hundred Twenty-Eight through Four Hundred Ninety-Two which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, *et seq.*, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal loansharking activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

**COUNTS FOUR HUNDRED TWENTY-EIGHT THROUGH FOUR HUNDRED NINETY-TWO**  
**(Money Laundering - American Home Builders)**

From in or about April 2000 continuing until in or about March 2004, in the District of Massachusetts and elsewhere, the defendants

**JOSEPH YERARDI, JR. and**  
**RAFIA FEGHI A/K/A RAFIA YERARDI,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, *et seq.*, to wit, the negotiation of checks drawn on the account of American Home Builders in the approximate aggregate amount of \$13,500 as specifically set forth below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<b><u>Count No.</u></b>	<b><u>Date</u></b>	<b><u>Check No.</u></b>	<b><u>Amount</u></b>
Count 428	4/19/2000	13492	\$200.00
Count 429	5/10/2000	13688	\$200.00
Count 430	5/17/2000	13725	\$200.00
Count 431	6/7/2000	13795	\$200.00
Count 432	6/14/2000	13822	\$200.00
Count 433	6/21/2000	13839	\$200.00
Count 434	7/12/2000	13943	\$200.00
Count 435	8/2/2000	14005	\$200.00

Count 436	8/16/2000	14080	\$200.00
Count 437	8/22/2000	14233	\$400.00
Count 438	9/27/2000	14244	\$200.00
Count 439	10/4/2000	14270	\$200.00
Count 440	11/30/2000	14445	\$200.00
Count 441	1/10/2001	14573	\$200.00
Count 442	1/25/2001	14609	\$200.00
Count 443	1/31/2001	14636	\$200.00
Count 444	2/11/2001	14674	\$200.00
Count 445	4/4/2001	14816	\$200.00
Count 446	4/12/2001	14853	\$200.00
Count 447	5/2/2001	14932	\$200.00
Count 448	6/14/2001	15064	\$200.00
Count 449	6/20/2001	15084	\$200.00
Count 450	6/23/2001	15005	\$200.00
Count 451	7/3/2001	15117	\$200.00
Count 452	7/25/2001	15186	\$200.00
Count 453	8/29/2001	15291	\$200.00
Count 454	9/6/2001	15319	\$200.00
Count 455	10/24/2001	15478	\$200.00
Count 456	1/23/2002	16345	\$200.00
Count 457	2/20/2002	16438	\$200.00



Count 458	2/27/2002	16455	\$200.00
Count 459	4/2002	16653	\$200.00
Count 460	4/17/2002	16614	\$200.00
Count 461	5/8/2002	16663	\$200.00
Count 462	5/15/2002	16692	\$200.00
Count 463	5/23/2002	16726	\$200.00
Count 464	5/29/2002	16742	\$200.00
Count 465	6/19/2002	16796	\$200.00
Count 466	7/3/2002	16850	\$200.00
Count 467	7/31/2002	16916	\$200.00
Count 468	9/6/2002	17016	\$200.00
Count 469	9/21/2002	17081	\$200.00
Count 470	10/11/2002	17135	\$200.00
Count 471	10/18/2002	17150	\$200.00
Count 472	10/28/2002	17170	\$200.00
Count 473	11/8/2002	17243	\$200.00
Count 474	3/21/2003	17581	\$200.00
Count 475	3/28/2003	17602	\$200.00
Count 476	4/18/2003	17662	\$200.00
Count 477	4/25/2003	17684	\$200.00
Count 478	5/23/2003	17792	\$300.00
Count 479	6/6/2003	17848	\$200.00

Page 121

Count 480	6/13/2003	17868	\$200.00
Count 481	6/28/2003	17915	\$200.00
Count 482	8/8/2003	18072	\$200.00
Count 483	8/14/2003	18099	\$200.00
Count 484	9/19/2003	18205	\$200.00
Count 485	10/10/2003	18287	\$400.00
Count 486	10/24/2003	18333	\$200.00
Count 487	11/7/2003	18380	\$200.00
Count 488	12/19/2003	18491	\$200.00
Count 489	1/9/2004	18565	\$200.00
Count 490	1/23/2004	18604	\$200.00
Count 491	3/5/2004	18740	\$200.00
Count 492	3/12/2004	18788	\$200.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNTS FOUR HUNDRED NINETY-THREE THROUGH FOUR HUNDRED NINETY-FIVE**  
**(Structuring Cash Transactions For Purpose Of Evading Reporting Requirements - Bank Checks)**

On or about the dates and times, and at the locations of Sovereign Bank offices, set forth below, such dates and times being approximate, within the District of Massachusetts, the defendant

**MARY ANN GIANELLI,**

aided and abetted by others known and unknown to the grand jury, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and regulations prescribed thereunder with respect to domestic coin and currency transactions, caused and attempted to cause domestic financial institutions to fail to file reports required under Title 31, United States Code, Section 5313(a) and regulations prescribed thereunder, and structured, assisted in structuring, and attempted to structure and assist in structuring such transactions with domestic financial institutions:

<u>Count No.</u>	<u>Dates</u>	<u>Check No.</u>	<u>Amount</u>	<u>Location</u>	<u>Time</u>
Count 493	4/14/2005	5221430	\$10,000.00	Wakefield	3:37 p.m.
	4/14/2005	5221429	\$10,000.00	Melrose	4:04 p.m.
	4/15/2005	5221428	\$10,000.00	Middleton	11:09 a.m.
Count 494	4/21/2005	5221423	\$10,000.00	Reading	1:06 p.m.
	4/21/2005	5221424	\$10,000.00	Saugus	2:43 p.m.
Count 495	4/27/2005	5221425	\$10,000.00	Reading	11:09 a.m.
	4/27/2005	5221426	\$10,000.00	Wakefield	11:43 a.m.

All in violation of Title 31, United States Code, Section 5324(a) and Title 18, United States Code, Section 2.

**COUNTS FOUR HUNDRED NINETY-SIX THROUGH FIVE HUNDRED FIVE**  
 (Structuring Cash Transactions For Purpose Of Evading Reporting Requirements - Postal Money Orders)

On or about the dates, and at the post office locations, set forth below, such dates and times being approximate, within the District of Massachusetts and elsewhere, the defendant

**MARY ANN GIANELLI,**

aided and abetted by others known and unknown to the grand jury, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and regulations prescribed thereunder with respect to domestic coin and currency transactions, caused and attempted to cause domestic financial institutions to fail to file reports required under Title 31, United States Code, Section 5313(a) and regulations prescribed thereunder, and structured, assisted in structuring, and attempted to structure and assist in structuring such transactions with domestic financial institutions:

<u>Count No.</u>	<u>Date</u>	<u>Total Amount</u>	<u>Location</u>
Count 496	9/19/2005	\$2,000.00	Wakefield
	9/19/2005	\$2,000.00	Woburn
	9/19/2005	\$1,000.00	Reading
Count 497	11/26/2005	\$2,000.00	Reading
	11/26/2005	\$1,000.00	Woburn
Count 498	12/6/2005	\$2,500.00	Reading
	12/6/2005	\$2,500.00	Andover
	12/6/2005	\$2,500.00	Middleton
	12/6/2005	\$2,500.00	Wakefield
	12/6/2005	\$2,000.00	North Reading
	12/6/2005	\$2,000.00	Woburn
Count 499	12/12/2005	\$2,000.00	North Reading
	12/12/2005	\$2,000.00	North Andover

Count 500	12/14/2005	\$2,500.00	Middleton
	12/14/2005	\$2,000.00	South Lynnfield
Count 501	12/19/2005	\$2,500.00	Andover
	12/19/2005	\$2,000.00	Londonderry, New Hampshire
Count 502	2/16/2006	\$1,000.00	Reading
	2/16/2006	\$1,000.00	North Reading
	2/16/2006	\$1,000.00	Middleton
	2/16/2006	\$1,000.00	South Lynnfield
Count 503	4/22/2006	\$1,000.00	Greenwood Station, Wakefield
	4/22/2006	\$1,000.00	Wakefield
	4/22/2006	\$1,000.00	Andover
Count 504	4/24/2006	\$1,000.00	South Lynnfield
	4/24/2006	\$1,000.00	Woburn
	4/24/2006	\$1,000.00	Reading
Count 505	5/23/2006	\$1,000.00	North Reading
	5/23/2006	\$1,000.00	Wakefield
	5/23/2006	\$1,000.00	Peabody
	5/23/2006	\$1,000.00	Londonderry, New Hampshire

All in violation of Title 31, United States Code, Section 5324(a) and Title 18, United States Code, Section 2.

COUNT FIVE HUNDRED SIX  
(Making And Subscribing False Tax Return - 2002)

On or about April 14, 2003, in the District of Massachusetts, the defendant

**MARY ANN GIANELLI**

did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, listing a Lynnfield, Massachusetts address, for tax year 2002, which contained and was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which return **MARY ANN GIANELLI** did not believe to be true and correct as to every material matter in that said return including Schedule C-EZ thereto falsely reported that **MARY ANN GIANELLI** was the sole proprietor of a local freight trucking business and that this trucking business had received gross receipts totaling \$32,760.00 during 2002, whereas in truth and fact, as **MARY ANN GIANELLI** then and there well knew and believed, **MARY ANN GIANELLI** had not been the proprietor of a local freight trucking business during 2002, and the gross receipts that **MARY ANN GIANELLI** reported on the Schedule C-EZ attached to her 2002 U.S. Individual Income Tax return were in fact income that her husband, the defendant **ARTHUR GIANELLI**, had earned from illegal activities.

All in violation of Title 26, United States Code, Section 7206(1).



COUNT FIVE HUNDRED SEVEN  
(Making And Subscribing False Tax Return - 2003)

On or about November 15, 2004, in the District of Massachusetts, the defendant

**MARY ANN GIANELLI**

did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, listing a Lynnfield, Massachusetts address, for tax year 2003, which contained and was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which return **MARY ANN GIANELLI** did not believe to be true and correct as to every material matter in that said return including Schedule C thereto falsely reported that **MARY ANN GIANELLI** was the sole proprietor of a local freight trucking business and that this trucking business had received gross receipts totaling \$32,760.00 during 2003, whereas in truth and fact, as **MARY ANN GIANELLI** then and there well knew and believed, **MARY ANN GIANELLI** had not been the proprietor of a local freight trucking business during 2003, and the gross receipts that **MARY ANN GIANELLI** reported on the Schedule C attached to her 2003 U.S. Individual Income Tax return were in fact income that her husband, the defendant **ARTHUR GIANELLI**, had earned from illegal activities.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT FIVE HUNDRED EIGHT  
(Making Extortionate Extension Of Credit - Meehan)

From in or before 2004 and continuing until in or about 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendant

**PHILIP PUOPOLO**

made extortionate extensions of credit to William Meehan.

In violation of Title 18, United States Code, Sections 892(a) and 2.

**COUNT FIVE HUNDRED NINE**  
(Extortionate Collection Of Credit Conspiracy - Meehan)

In or about 2005, that date being approximate and inclusive, within the District of Massachusetts, the defendant

**PHILIP PUOPOLO,**

and others known and unknown to the grand jury, including co-conspirator Joseph Mercurio, knowingly conspired to participate in the use of extortionate means to collect and attempt to collect an extension of credit from William Meehan.

In violation of Title 18, United States Code, Section 894(a)(1).

COUNT FIVE HUNDRED TEN  
(Extortionate Collection Of Credit - Meehan)

In or about 2005, that date being approximate and inclusive, within the District of Massachusetts, the defendant

**PHILIP PUOPOLO,**

and others known and unknown to the grand jury, including Joseph Mercurio, did knowingly participate in the use of extortionate means to collect and attempt to collect an extension of credit from William Meehan.

In violation of Title 18, United States Code, Sections 894(a)(1) and 2.

**COUNT FIVE HUNDRED ELEVEN**  
**(Witness Tampering - Meehan)**

In or about 2005, that date being approximate and inclusive, within the District of Massachusetts, the defendant

**PHILIP PUOPOLO**

knowingly attempted to corruptly persuade another person, to wit, William Meehan, and engaged in misleading conduct toward another person, to wit, William Meehan, with intent to influence the testimony of William Meehan in an official proceeding.

In violation of Title 18, United States Code, Section 1512(b)(1).

**COUNT FIVE HUNDRED TWELVE**  
(Extortionate Collection Of Credit Conspiracy - Barnes)

From in or before 2001 and continuing until in or about 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI and  
PHILIP PUOPOLO,**

and others known and unknown to the grand jury, knowingly conspired to participate in the use of extortionate means to collect and attempt to collect an extension of credit from Charles Christopher Barnes.

In violation of Title 18, United States Code, Section 894(a)(1).



COUNT FIVE HUNDRED THIRTEEN  
(Extortionate Collection Of Credit - Barnes)

From in or before 2001 and continuing until in or about 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI and  
PHILIP PUOPOLO,**

and others known and unknown to the grand jury, did knowingly participate in the use of extortionate means to collect and attempt to collect an extension of credit from Charles Christopher Barnes.

In violation of Title 18, United States Code, Sections 894(a)(1) and 2.

**COUNT FIVE HUNDRED FOURTEEN**  
(Extortionate Collection Of Credit Conspiracy - Bakanosky)

From in or before 2003 and continuing until in or about 2004, both dates being approximate and inclusive, within the District of Massachusetts, the defendant

**PHILIP PUOPOLO**

and others known and unknown to the grand jury, knowingly conspired to participate in the use of extortionate means to collect and attempt to collect an extension of credit from Mike Bakanosky.

In violation of Title 18, United States Code, Sections 894(a)(1).

**COUNT FIVE HUNDRED FIFTEEN**  
(Extortionate Collection Of Credit - Bakanosky)

From in or before 2003 and continuing until in or about 2004, both dates being approximate and inclusive, within the District of Massachusetts, the defendant

**PHILIP PUOPOLO**

and others known and unknown to the grand jury, did knowingly participate in the use of extortionate means to collect and attempt to collect an extension of credit from Mike Bakanosky.

In violation of Title 18, United States Code, Sections 894(a)(1) and 2.

**COUNT FIVE HUNDRED SIXTEEN**  
(Extortionate Collection Of Credit Conspiracy - Mousis)

From in or before August 2004 and continuing at least until in or about December 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR., and  
PHILIP PUOPOLO,**

and others known and unknown to the grand jury, including co-conspirator Joseph Mercurio, knowingly conspired to participate in the use of extortionate means to collect and attempt to collect an extension of credit from John Mousis.

In violation of Title 18, United States Code, Sections 894(a)(1).

**COUNT FIVE HUNDRED SEVENTEEN**  
**(Extortionate Collection Of Credit - Mousis)**

From in or before August 2004 and continuing at least until in or about December 2005, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR., and  
PHILIP PUOPOLO,**

and others known and unknown to the grand jury, including co-conspirator Joseph Mercurio, did knowingly participate in the use of extortionate means to collect and attempt to collect an extension of credit from John Mousis.

In violation of Title 18, United States Code, Sections 894(a)(1) and 2.

COUNT FIVE HUNDRED EIGHTEEN  
(Extortionate Collection Of Credit Conspiracy - Castinetti)

From in or before 2000 and continuing until in or about 2004, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
SALVATORE RAMASCI A/K/A "LEFTY," and  
PHILIP PUOPOLO,**

and others known and unknown to the grand jury, knowingly conspired to participate in the use of extortionate means to collect and attempt to collect an extension of credit from Philip Castinetti.

In violation of Title 18, United States Code, Sections 894(a)(1) and 2.



COUNT FIVE HUNDRED NINETEEN  
(Extortionate Collection Of Credit - Castinetti)

From in or before 2000 and continuing until in or about 2004, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
SALVATORE RAMASCI A/K/A "LEFTY," and  
PHILIP PUOPOLO,**

and others known and unknown to the grand jury, did knowingly participate in the use of extortionate means to collect and attempt to collect an extension of credit from Philip Castinetti.

In violation of Title 18, United States Code, Sections 894(a)(1).

COUNT FIVE HUNDRED TWENTY  
(Witness Tampering - James Puopolo)

In or about 2006, that date being approximate and inclusive, within the District of Massachusetts, the defendant **PHILIP PUOPOLO** knowingly attempted to corruptly persuade another person, to wit, James Puopolo, and engaged in misleading conduct toward another person, to wit, James Puopolo, with intent to influence the testimony of James Puopolo in an official proceeding.

In violation of Title 18, United States Code, Section 1512(b)(1).

**RACKETEERING FORFEITURE ALLEGATIONS**

1. The allegations of Counts One and Two of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1963.

2. As a result of the offenses in violation of Title 18, United States Code, Section 1962, set forth in Counts One and Two of this indictment, the defendants

**ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI A/K/A "LEFTY,"  
FRANK IACABONI,  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,  
MARY ANN GIANELLI,  
GISELE ALBERTELLI, and  
RAFIA FEGHI A/K/A RAFIA YERARDI,**

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 1963(a):

(i) all interests the defendants have acquired and maintained in violation of Title 18, United States Code, Section 1962, wherever located, and in whatever names held;

(ii) all interests in, securities of, claims against, and properties and contractual rights of any kind affording a source of influence over, any enterprise which the defendants have established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and

(iii) all property constituting, and derived from, any proceeds which the defendants obtained, directly and indirectly, from racketeering activity and unlawful debt collection in violation of Title 18, United States Code, Section 1962.

Pursuant to 18 U.S.C. § 1963 and subparagraph (ii) of this paragraph, the defendants shall forfeit any interests in, securities of, claims against, and properties and contractual rights of any kind affording a source of influence over The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille, a Massachusetts corporation, and The Big Dog Realty Trust.

The property to be forfeited by the defendants pursuant to 18 U.S.C. § 1963 and subparagraphs (i) and (iii) of this paragraph includes, but is not limited to, the following assets:

- a. the real property and buildings located at 420 Main Street, Lynnfield, Massachusetts, title to which appears in a deed recorded at the Essex County Registry of Deeds, Book 16986, Page 591;
- b. the real property, with all rights appertaining thereto, known as Unit 334-9, created by Master Deed dated June 30, 1980 and recorded with the Suffolk County Registry of Deeds, Book 9482, Page 186, and located at 334 Beacon Street, Unit 9, Boston, Massachusetts, title to which appears in a deed recorded at the Suffolk County Registry of Deeds, Book 22460, Page 248;
- c. the real property, with all rights appertaining thereto, known as Unit No. 405B, as described in the Master Condominium Certificate of Title and in the Master Deed Document No. 614053 as amended and indicated on Condominium Plan No. 17257 C-4, and located at The Gables, Unit 405-B, Dedham Street, Newton, Massachusetts, title to which appears in a deed recorded with the Middlesex Land Court, Document No. U2058, Book U11, Page 58;

d. Eastern Bank Treasurer's Check number 00691883, in the amount of \$24,039.15, representing all funds on deposit in Eastern Bank account number 0402231385, seized by the Massachusetts State Police on March 9, 2004;

e. Family Federal Savings Treasurer's Check number 5701, in the amount of \$9,226.89, representing all funds on deposit in Family Federal Savings account number 2012002144, seized by the Massachusetts State Police on March 9, 2004;

f. Clinton Savings Bank Treasurer's Check number 14360, in the amount of \$6,350.02, representing all funds on deposit in Clinton Savings Bank account number 117000980, seized by the Massachusetts State Police on March 9, 2004;

g. Cambridge Trust Company Treasurer's Check number 110309, in the amount of \$60,844.19, representing all funds on deposit in certificate of deposit account numbers 73503526, 73503527, 73503528, 73503529, 73503531, 73503532, 73503533, 73503534, and 73503535, seized by the Massachusetts State Police on March 9, 2004;

h. \$3,359.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Arthur Gianelli in Lynnfield, Massachusetts;

i. \$1,705.00 in United States currency seized by the Massachusetts State Police on March 9, 2004 from Dennis Albertelli in Dracut, Massachusetts;

j. \$103,155.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts;

k. \$1,880 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Dennis Albertelli in Hudson, Massachusetts;

l. \$641.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 48 Pleasant Street, Stoneham, Massachusetts;

m. one 2.01 carat diamond ring, seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts; and

n. \$39,000 in United States currency seized on January 6, 2005 from 420 Main Street, Lynnfield, Massachusetts.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 1963, as a result of any act and omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendants up to the value of the property described in subparagraphs a through e hereof, including without limitation:

(a) Eastern Bank Treasurer's Check number 00691882, in the amount of \$204,594.62, representing all funds on deposit in account number 00200402089, seized by the Massachusetts State Police on March 9, 2004.

4. The above named defendants and each of them are jointly and severally liable for the forfeiture obligations as alleged above.



Page 144

All pursuant to Title 18, United States Code, Section 1963.

GAMBLING FORFEITURE ALLEGATIONS

1. The allegations of Counts Three through Seven of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(c), Title 28 U.S.C., Section 2461(c) and 18 U.S.C. § 1955(d).

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 1955(d), each defendant who is convicted of one or more of the offenses set forth in Counts Three through Seven of this indictment shall forfeit to the United States the following property:

(a) Any property, real or personal, which constitutes or is derived from proceeds traceable to each offenses in violation of Title 18, United States Code, Section 1955, and any property, including money, used in violation of the provisions of Title 18, United States Code, Section 1955.

(b) A sum of money equal to the total amount of proceeds traceable to those offenses, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

The property to be forfeited by the defendants pursuant to Sections 981(a)(1)(C) and 1955(d) includes, but is not limited to, the following assets:

(a) The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille, a Massachusetts corporation, and The Big Dog Realty Trust;

(b) the real property and buildings located at 420 Main Street, Lynnfield, Massachusetts, title to which appears in a deed recorded at the Essex County Registry of Deeds, Book 16986, Page 591;

(c) the real property, with all rights appertaining thereto, known as Unit 334-9, created by Master Deed dated June 30, 1980 and recorded with the Suffolk County Registry of Deeds, Book 9482, Page 186, and located at 334 Beacon Street, Unit 9, Boston, Massachusetts, title to which appears in a deed recorded at the Suffolk County Registry of Deeds, Book 22460, Page 248;

(d) the real property, with all rights appertaining thereto, known as Unit No. 405B, as described in the Master Condominium Certificate of Title and in the Master Deed Document No. 614053 as amended and indicated on Condominium Plan No. 17257 C-4, and located at The Gables, Unit 405-B, Dedham Street, Newton, Massachusetts, title to which appears in a deed recorded with the Middlesex Land Court, Document No. U2058, Book U11, Page 58;

(e) Eastern Bank Treasurer's Check number 00691883, in the amount of \$24,039.15, representing all funds on deposit in Eastern Bank account number 0402231385, seized by the Massachusetts State Police on March 9, 2004;

(f) Family Federal Savings Treasurer's Check number 5701, in the amount of \$9,226.89, representing all funds on deposit in Family Federal Savings account number 2012002144, seized by the Massachusetts State Police on March 9, 2004;

(g) Clinton Savings Bank Treasurer's Check number 14360, in the amount of \$6,350.02, representing all funds on deposit in Clinton Savings Bank account number 117000980, seized by the Massachusetts State Police on March 9, 2004;

(h) Cambridge Trust Company Treasurer's Check number 110309, in the amount of \$60,844.19, representing all funds on deposit in certificate of deposit account numbers 73503526, 73503527, 73503528, 73503529, 73503531, 73503532, 73503533, 73503534, and 73503535, seized by the Massachusetts State Police on March 9, 2004;

(i) \$3,359.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Arthur Gianelli in Lynnfield, Massachusetts;

(j) \$1,705.00 in United States currency seized by the Massachusetts State Police on March 9, 2004 from Dennis Albertelli in Dracut, Massachusetts;

(k) \$103,155.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts;

(l) \$1,880 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Dennis Albertelli in Hudson, Massachusetts;

(m) \$641.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 48 Pleasant Street, Stoneham, Massachusetts;

(n) one 2.01 carat diamond ring, seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts; and

(o) \$39,000 in United States currency seized on January 6, 2005 from 420 Main Street, Lynnfield, Massachusetts.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 1955(d), as a result of any act and omission of the defendants --

a. cannot be located upon the exercise of due diligence;

- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 981(b)(1)(A) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendants up to the value of the property listed in subparagraphs a through e hereof, including without limitation:

- a. Eastern Bank Treasurer's Check number 00691882, in the amount of \$204,594.62, representing all funds on deposit in account number 00200402089, seized by the Massachusetts State Police on March 9, 2004.

All pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 1955(d).

MONEY LAUNDERING FORFEITURE ALLEGATIONS

1. The allegations of Counts Eight through Two Hundred Seventy-Two, Two Hundred Seventy-Nine, and Two Hundred Eighty-Four through Four Hundred Ninety-Two of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in Counts Eight through Two Hundred Seventy-Two, Two Hundred Seventy-Nine, and Two Hundred Eighty-Four through Four Hundred Ninety-Two of this indictment shall forfeit to the United States the following property:

a. Any property, real or personal, involved in each offense in violation of Title 18, United States Code, Section 1956, for which the defendant is convicted, and all property traceable to such property.

b. A sum of money equal to the total amount of money involved in each offense in violation of Title 18, United States Code, Section 1956, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

The property to be forfeited by the defendants pursuant to Section 982(a)(1) includes, but is not limited to, the following assets:

(a) The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille, a Massachusetts corporation, and The Big Dog Realty Trust;



(b) the real property and buildings located at 420 Main Street, Lynnfield, Massachusetts, title to which appears in a deed recorded at the Essex County Registry of Deeds, Book 16986, Page 591;

(c) the real property, with all rights appertaining thereto, known as Unit 334-9, created by Master Deed dated June 30, 1980 and recorded with the Suffolk County Registry of Deeds, Book 9482, Page 186, and located at 334 Beacon Street, Unit 9, Boston, Massachusetts, title to which appears in a deed recorded at the Suffolk County Registry of Deeds, Book 22460, Page 248;

(d) the real property, with all rights appertaining thereto, known as Unit No. 405B, as described in the Master Condominium Certificate of Title and in the Master Deed Document No. 614053 as amended and indicated on Condominium Plan No. 17257 C-4, and located at The Gables, Unit 405-B, Dedham Street, Newton, Massachusetts, title to which appears in a deed recorded with the Middlesex Land Court, Document No. U2058, Book U11, Page 58;

(e) Eastern Bank Treasurer's Check number 00691883, in the amount of \$24,039.15, representing all funds on deposit in Eastern Bank account number 0402231385, seized by the Massachusetts State Police on March 9, 2004;

(f) Family Federal Savings Treasurer's Check number 5701, in the amount of \$9,226.89, representing all funds on deposit in Family Federal Savings account number 2012002144, seized by the Massachusetts State Police on March 9, 2004;

(g) Clinton Savings Bank Treasurer's Check number 14360, in the amount of \$6,350.02, representing all funds on deposit in Clinton Savings Bank account number 117000980, seized by the Massachusetts State Police on March 9, 2004;

(h) Cambridge Trust Company Treasurer's Check number 110309, in the amount of \$60,844.19, representing all funds on deposit in certificate of deposit account numbers 73503526, 73503527, 73503528, 73503529, 73503531, 73503532, 73503533, 73503534, and 73503535, seized by the Massachusetts State Police on March 9, 2004; and

(i) one 2.01 carat diamond ring, seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 982, as a result of any act and omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendants up to the value of the property listed in subparagraphs a through e hereof, including without limitation:

(a) Eastern Bank Treasurer's Check number 00691882, in the amount of \$204,594.62, representing all funds on deposit in account number 00200402089, seized by the Massachusetts State Police on March 9, 2004.

All pursuant to Title 18, United States Code, Section 982.

ARSON FORFEITURE ALLEGATIONS

1. The allegations of Counts Two Hundred Seventy-Four and Two Hundred Seventy-Five of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(B).

2. As a result of the offenses in violation of Title 18, United States Code, Section 844, set forth in Counts Two Hundred Seventy-Four and Two Hundred Seventy-Five of this indictment, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI A/K/A "FISH," and  
FRANK IACABONI**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offenses.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 982, as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all

Page 153

other property of the defendants up to the value of the property listed in subparagraphs a through e hereof.

All pursuant to Title 18, United States Code, Section 982.

EXTORTION FORFEITURE ALLEGATIONS

1. The allegations of Counts Two Hundred Seventy-Six, Two Hundred Seventy-Seven, and Two Hundred Eighty through Two Hundred Eighty-Three of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), each defendant who is convicted of one or more of the offenses set forth in Counts Two Hundred Seventy-Six, Two Hundred Seventy-Seven, and Two Hundred Eighty through Two Hundred Eighty-Three of this indictment, shall forfeit to the United States the following property:

(a) Any property, real or personal, which constitutes or is derived from proceeds traceable to each offense in violation of Title 18, United States Code, Section 1951.

(b) A sum of money equal to the total amount of proceeds traceable to those offenses, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 981, as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in subparagraphs a through e hereof.

All pursuant to Title 18, United States Code, Section 981 and 28 United States Code, Section 2461(c).



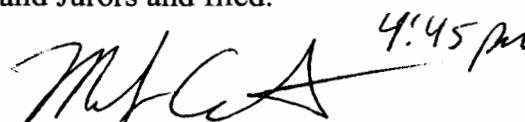
A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; September 13, 2006.

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK 4:45 pm

**U.S. District Court - District of Massachusetts**

Date: 9/13/06 Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Eneyda Gonzalez Rodriguez

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>235</u>
Set 6	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>236-238</u>
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Date: 9/13/06 Signature of AUSA: *M. A. Smith*

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Stephen Russo

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Date: 9/13/06 Signature of AUSA: Michael V. Zahel



District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Michael Pinialis

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>235</u>
Set 6	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>236-238</u>
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Signature of AUSA: Richard K. [Signature]

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Mary Ann Gianelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>4</u>
Set 4	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>186</u>
Set 5	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>187-234, 330-422</u>
Set 6	<u>31 USC 5324(a)</u>	<u>Structuring Cash Transactions</u>	<u>493-495, 496-505</u>
Set 7	<u>26 USC 7206(1)</u>	<u>Making &amp; Subscribing False Tax Return</u>	<u>506, 507</u>
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. 1 Investigating Agency MSP/IRS/ATFCity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Philip Puopolo Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date (Year only): \_\_\_\_\_ SSN (last 4 #): \_\_\_\_\_ Sex \_\_\_\_\_ Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☐ No List language and/or dialect: \_\_\_\_\_Victims: ☐ Yes ☐ No If Yes, are there multiple crime victims under 18 U.S.C. §3771(d)(2) ☐ Yes ☐ NoMatter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 19

Continue on Page 2 for Entry of U.S.C. Citations

☐ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 9/13/06 Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Philip Puopolo

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3, 4</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 892(a)</u>	<u>Extortionate Extension of Credit</u>	<u>508</u>
Set 6	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit</u>	<u>510, 513, 515, 517, 519</u>
Set 7	<u>18 USC 1512(b)(1)</u>	<u>Witness Tampering</u>	<u>511, 520</u>
Set 8	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit Conspiracy</u>	<u>509, 512, 514, 516, 518</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

R 20/R 40 from District of \_\_\_\_\_

Date: 9/13/06 Signature of AUSA: Michael T. Kunk



District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Arthur Gianelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3, 4, 5</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>8</u>
Set 6	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 187-234, 236-238, 239-272, 284- 306, 307-309, 310-329</u>
Set 7	<u>18 USC 371</u>	<u>Conspiracy</u>	<u>273</u>
Set 8	<u>18 USC 844(i)</u>	<u>Arson</u>	<u>274</u>
Set 9	<u>18 USC 844(h)(1)</u>	<u>Use of Fire to Commit a Federal Felony</u>	<u>275</u>
Set 10	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>276, 280, 281, 282, 283</u>
Set 11	<u>18 USC 1951</u>	<u>Attempted Extortion</u>	<u>277</u>
Set 12	<u>18 USC 1952(a)(3)</u>	<u>Interstate Travel in Aid of Racketeering</u>	<u>278</u>
Set 13	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit</u>	<u>513, 517, 519</u>
Set 14	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit Conspiracy</u>	<u>512, 516, 518</u>
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Mineral P. Labak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Dennis Albertelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3, 4, 5</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>8</u>
Set 6	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 187-234, 236-238, 239-272, 279, 284-306, 423-426</u>
Set 7	<u>18 USC 371</u>	<u>Conspiracy</u>	<u>273</u>
Set 8	<u>18 USC 844(i)</u>	<u>Arson</u>	<u>274</u>
Set 9	<u>18 USC 844(h)(1)</u>	<u>Use of Fire to Commit a Federal Felony</u>	<u>275</u>
Set 10	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>276</u>
Set 11	<u>18 USC 1951</u>	<u>Attempted Extortion</u>	<u>277</u>
Set 12	<u>18 USC 1952(a)(3)</u>	<u>Interstate Travel in Aid of Racketeering</u>	<u>278</u>
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Date: 7/13/06 Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Frank Iacaboni

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3, 5</u>
Set 4	<u>18 USC 371</u>	<u>Conspiracy</u>	<u>273</u>
Set 5	<u>18 USC 844(i)</u>	<u>Arson</u>	<u>274</u>
Set 6	<u>18 USC 844(h)(1)</u>	<u>Use of Fire to Commit a Federal Felony</u>	<u>275</u>
Set 7	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>276</u>
Set 8	<u>18 USC 1951</u>	<u>Attempted Extortion</u>	<u>277</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Wm. L. L. L.



District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Gisele Albertelli

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>5</u>
Set 4	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>186</u>
Set 5	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>187-234</u>
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

**Signature of AUSA:**

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Joseph Yerardi

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>9, 87, 427</u>
Set 6	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 428-492</u>
Set 7	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit</u>	<u>517</u>
Set 8	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit Conspiracy</u>	<u>516</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

Date: 9/13/06 Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Rafia Feghi

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>9, 427</u>
Set 4	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>10-86, 428-492</u>
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**U.S. District Court - District of Massachusetts**

**Related Case Information:**

R 20/R 40 from District of \_\_\_\_\_

Date: 9/13/06 Signature of AUSA: [Signature]



District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Randy Albertelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3, 5</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Boston Category No. 1 Investigating Agency MSP/IRS/ATF

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant                      New Defendant                       
Magistrate Judge Case Number                       
Search Warrant Case Number                       
R 20/R 40 from District of                     

Defendant Information:

Defendant Name Salvatore Ramasci Juvenile ☐ Yes ☒ No

Alias Name                     

Address                     

Birth date (Year only):            SSN (last 4 #):            Sex            Race:                      Nationality:                     

Defense Counsel if known: Joseph Balliro, Sr. Address: 99 Summer Street  
Boston, MA 02110

Bar Number:                     

U.S. Attorney Information:

AUSA Michael L. Tabak Bar Number if applicable                     

Interpreter: ☐ Yes ☐ No List language and/or dialect:                     

Victims: ☐ Yes ☐ No If Yes, are there multiple crime victims under 18 U.S.C. §3771(d)(2) ☐ Yes ☐ No

Matter to be SEALED: ☒ Yes ☐ No

☐ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status:

Arrest Date:                     

☐ Already in Federal Custody as                      in                     

☐ Already in State Custody                      ☐ Serving Sentence ☐ Awaiting Trial

☒ On Pretrial Release: Ordered by Maj. Judge Swartwood on                     

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty                      ☐ Misdemeanor                      ☒ Felony 218

Continue on Page 2 for Entry of U.S.C. Citations

☐ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 9/13/06 Signature of AUSA: Michael L. Tabak

JS 45 (5/97) - (Revised USAO MA 11/15/05) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Salvatore Ramasci

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962(d)</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962(c)</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business</u>	<u>3, 4</u>
Set 4	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility</u>	<u>6, 7</u>
Set 5	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>8</u>
Set 6	<u>18 USC 1956(a)(1)(A)(i) &amp; 1956 (a)(1)(B)(i)</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 239-272</u>
Set 7	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit</u>	<u>519</u>
Set 8	<u>18 USC 894(a)(1)</u>	<u>Extortionate Collection of Credit Conspiracy</u>	<u>518</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: